

# Integrity Policy for Mensen met een MIssie

# Contents

1	Integrity Policy for Mensen met een MIssie	3
2	Code of Conduct for Employees, Missionaries, Trainees and Volunteers People with a Mission	
3	Risk and Sanctions Policy Partner Organisations and programme countries	.10
4	Child Safeguarding Policy	.15
5	Data protection policy	.18
Ann	nex 1: GDPR Personal User Agreement	.25
Ann	nex 2: Mensen met een MIssie - Child Safeguarding Code of Conduct	.27
Ann	nex 3: Code of conduct for the use of social media	.29
Ann	nex 4: Acceptance of policies and code of conducts	.32

# **1** Integrity Policy for Mensen met een MIssie

#### 1.1 The basics

Faith, perseverance, human dignity and solidarity are the core values of Mensen met een MIssie as a missionary Catholic development organization. These values require reliable, honest and careful action. This is the basis of our integrity policy.

#### 1.2 Tools

Mensen met een MIssie use the following tools for its integrity policy.

- Code of Good Governance as it is part of the Recognition Regulation for Good Causes and controlled by CBF.
- Code of Conduct for employees, missionaries, trainees and volunteers.
- Risk and sanctions policy of partner organisations and programme countries
- Child Safeguarding Policy
- Data protection policy (based on GDPR)

Mensen met een MIssie has brought together these various documents and (underlying) codes in this document in order to form a unilateral and consistent whole.

For this revised integrity policy, the four elements as provided by the CBF have also been taken as a guide:

- Prevention
- Identification
- Enforcement
- Justifying

#### 1.3 Prevention

Prevention of non-integer behaviour is the starting point. The continuous development of an open culture in which integrity is the starting point and in which an open discussion can be started at the same time about things that 'grate' is essential. Two things in particular are used for this purpose:

# 1) Code of conduct

The Code of Conduct gives direction as well as concrete expectations regarding the behaviour and relationships of employees and associates. It indicates what measures the organisation will take if there is a deviation from the indicated code. Of course, the code may not cover all possible cases or topics, but contains sufficient tools to address possible issues.

## 2) Facilitating internal conversation and awareness

Integrity and related matters are addressed throughout the organisation at least twice a year. Through workshops, meetings or cases brought in by employees, the conversation will be stimulated and an opportunity will be created for employees to bring in any matters for which there is no unambiguous answer known. `This also applies to the

data protection policy (GDPR) since this is also part of an integrity approach with the (ex) donors and supporters of the organisation.

3) Facilitating awareness and external discussion

The context in which partner organisations work is significantly different from ours. In addition to contractual agreements on integrity, unacceptable behaviour and fraud, we encourage discussion in this regard during working visits and partner meetings. The 'Focal Points' in the programme countries are important players here.

#### 1.4 Identification

Integrity always pertains to sensitive issues. A low-threshold way of addressing inappropriate behaviour at an early stage is therefore essential. Mensen met een MIssie consider it important that this is not only done for their own employees, but also for our partners and their target groups in the field, given the nature of our work.

Mensen met een MIssie therefore opts for two lines where employees and partners can report inappropriate behaviour safely and discreetly:

- 1) Confidential advisor for staff, employees and volunteers

  Mensen met een MIssie uses the services of Mr Tom Claessen as a confidential advisor.

  Employees and volunteers can contact him anonymously with their reports,
  observations, etc. From here, the process is continued with the director/administrator of
  Mensen met een MIssie (see under 5. Enforcement
- 2) Integrity contact point for partners and beneficiaries
  Employees of partner organisations, local institutes, the self-employed or beneficiaries
  of the partner organisations can contact the integrity contact point directly. This can be
  done through the specific integrity email account. The contact person is not an
  employee of Mensen met een MIssie, but knows the contexts in which they work and is
  therefore an appropriate person for the partners.

Both channels are regularly brought to the attention of Mensen met een MIssie, internally during the meetings and externally through the Focal Points and in the contracts with partners.

# 1.5 Enforcement

If there is a report of inappropriate behaviour, it is crucial that a careful process takes place. A process in which it is clear which steps are taken and how confidentiality is guaranteed.

The following Action Protocol is used for this purpose:

 All employees and partners have a role in identifying (suspicions of) sexual abuse, inappropriate behaviour and fraud. This applies to both severe and minor inappropriate behaviours, as they signal a climate where more severe forms are more likely to occur.

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<sup>&</sup>lt;sup>1</sup> Local coordinators of the programmes

- 2. Anyone who suspects or hears about sexual abuse or fraud is obliged to report this to the director, or for partners to the integrity contact point, who then takes it up with the director; the director does not immediately take action himself, but first informs the Supervisory Board.
- 3. When employees or partners doubts the seriousness or justification of a suspicion, there is an obligation to consult the confidential adviser or the point of contact for integrity, who they can ask for advice. The confidential advisor may also receive a report that reports sexually inappropriate behaviour or abuse and/or fraud from the director-administrator or other members of the management.
- 4. The obligation to report exceeds all other interests that could be at stake, such as the desire for confidentiality on the part of the victim (in the case of sexually inappropriate behaviour or abuse).
- 5. Ultimately, the process of establishing the truth is not up to employees, management or the board; this can disrupt a possible legal process. In the event of suspicion of fraud, the procedures as described in the Risk and Sanctions Policy are started (see Risk and Sanctions Policy 3b).
- 6. For that matter, a report is not an accusation. After a report, there is a careful and objective investigation into what is going on. In the case of sexually inappropriate behavior, attention is paid to both the privacy and interests of the suspected victim and that of the accused.
- 7. If desired, the board can be advised by (external) experts on further actions and then makes an appropriate decision. Since there is a wide variety of possible offences, from relatively minor to serious, there is no standard response to the disciplinary measures to be followed. However, there is a standard as to what steps are taken in any case when reporting:
  - o interview by the director-administrator with the person concerned
  - if the violation has been confirmed and acknowledged by the person concerned, an initial warning will be given and included in the personnel file.
  - If the violation is not acknowledged, but suspicions are present, the directoradministrator can have further investigations carried out by an external, independent investigator.
  - Based on an investigation, it is then determined whether a warning is indeed justified.
  - o If this or a similar violation takes place again, a second warning will be given with possibilities for temporary suspension, payroll implications, and/or a compulsory course for the violation.
  - o In the event of a third violation, immediate dismissal will take place.

In all cases, appropriate further measures must be taken, depending on the nature of the infringement. All this within the limits of the applicable Dutch law.

Furthermore, the employee concerned may file an appeal against the decision of the director-administrator. In this case, in consultation with the Supervisory Board, an independent committee will be set up to discover the correct facts.

If the employee subsequently finds that the outcome does not do justice to his situation, the case will be submitted to the court.

In the event of the establishment of a criminal offence, the following steps shall be taken instead of the above:

- securing and taking care of the victim (in the case of sexually inappropriate behaviour or abuse);
- conversation with the accused;
- o informative interview with the police;
- o If applicable, set up an emergency response team;
- declaration to the police;
- provisional measures regarding the suspected perpetrator/accused of the offence/crime (suspension and/or dismissal);
- o information to persons concerned;
- follow-up care.
- 8. In addition to the reporting obligation, a provisional gag order applies to the director-administrator, the Supervisory Board, the reporter and employees within the organisation in regard to third parties. These concerned persons can speak with the confidential adviser. A temporary gag order is necessary so that no more people are involved in a case than is necessary for careful treatment. It must be prevented that rumors arise and someone is labeled as 'guilty' in advance. The gag order is also important to ensure that any criminal proceedings are not hampered.
- 9. If there is a chance for media attention, a spokesperson will be appointed and there will be a consultation with the communication experts within Mensen met een MIssie about the strategy to be followed, with due observance of the temporary gag order. No more information is disclosed outside the organisation than is deemed necessary.
- 10. All appointments, contacts, telephone calls, findings, emails, etc. are recorded in a file.

# 1.6 Justifying

Mensen met een MIssie wants to be transparent about issues of integrity. In practice, this means that:

- 1) The Supervisory Board is always informed about possible cases of inappropriate behaviour or suspicions of fraud (after completing the initial checks of the risk and fraud policy).
- 2) Mensen met een MIssie reports on integrity issues and their settlement in the annual report. In the context of the protection of the persons concerned, this will sometimes have to be done in a very general way.

# 2 Code of Conduct for employees, missionaries, trainees and volunteers of Mensen met een MIssie

#### 2.1 Introduction

This Code of Conduct creates a framework for acting with integrity, as is expected of all employees, missionaries, trainees and volunteers of Mensen met een MIssie. By signing, they subscribe to the Code of Conduct.

# 2.2 Basic Principles

Mensen met een MIssie rejects any form of (sexual) harassment, aggression and discrimination based on race, age, beliefs, religion, political beliefs, gender, nationality, sexual orientation, marital status and disability.

Mensen met een MIssie takes it upon itself to prevent and combat these forms of undesirable behaviour in it's daily actions and in the development of policies.

Employees are expected to perform work activities and functions in an impartial and nondiscriminatory manner.

Employees are expected to speak out with respect about Mensen met een MIssie and its cooperation partners at home and abroad, also in their time off.

# 2.3 Scope of the Code of Conduct

The Code of Conduct applies to all employees, missionaries, trainees and volunteers of Mensen met een MIssie. From this point forward, they are collectively referred to as 'employee(s)'.

Mensen met een MIssie is responsible for the publication of the Code of Conduct. Each employee has the responsibility to know the code of conduct.

## 2.4 Definitions of inappropriate behaviour

## Discrimination

Any form of discrimination based on religion, belief, political affiliation, race, colour, physical or mental disability, nationality, gender, sexual orientation or on any ground whatsoever shall not be permitted.

# Intimidation

Cursing, expressing discriminatory language or speaking with a raised voice is undesirable. Physical expressions such as flying off the handle, getting in the way or tailing are also not accepted. This also applies to the expression of threats. Furthermore, physical violence is prohibited, as well as harassing someone, for example by constantly calling this person or sending an excessive number of text messages or emails.

#### Sexual intimidation.

Any attention with sexual overtones, expressed in verbal, physical or non-verbal behaviour, which may be intentional or unintentional and which is perceived as undesirable and unpleasant by the person(s) confronted with it, is prohibited.

#### Conflict of Interest

Any action that may result in mixing business and private interests should be avoided in order to avoid conflicts of interest. This rule means that, without personal advantage, actions taken must be reliable and professional. This also applies to the use of institutional knowledge and information, which will not be used for personal purposes.

## 2.5 Use of social media

Mensen met een MIssie wants to avoid privacy, security and image risks when it comes to the use of social media. For the guidelines, see appendix: *Code of Conduct for the use of social media*.

# 2.6 Relationships with other employees

Employees treat each other openly and professionally and respect cultural, religious and political differences.

Personal friendships among employees must not stand in the way of achieving the goals of Mensen met een MIssie.

Managers are not permitted to enter into a marriage relationship or a relationship of a similar nature with employees they manage. If the hierarchical relationships are not (or cannot) be changed, one of the two employees will have to terminate the employment contract.

## 2.7 Weapons

Mensen met een MIssie is committed to a safe working environment for its employees.

Employees are not permitted to possess, carry or otherwise have weapons at their disposal during their work for Mensen met een MIssie.

# 2.8 Drugs and alcohol

Under no circumstances may employees work under the influence of any drugs, legal or illegal, that impair their ability to perform their work properly.

Drugs are not allowed in the office of Mensen met een MIssie. Working

under the influence of alcohol is not permitted.

# 2.9 Relationships

Employees who have a relationship with a colleague, a program beneficiary, a relative of a program beneficiary or with a person employed by an organization or company with a contractual commitment to Mensen met een MIssie are required to report this to their supervisor, so that the supervisor can assess to what extent this can place the integrity of Mensen met een MIssie at risk.

# 2.10 Specific provisions for employees during their stay abroad

Employees adhere to local laws and regulations. If the Dutch legislation is stricter, then it is leading. Should an employee encounter a situation where the standards and values of Mensen met een MIssie conflict with local laws and regulations, the employee will discuss this with the supervisor in order to arrive at a correct assessment.

Employees must not be active in local political movements in the programme countries as a person, nor take the lead in social activities that may harm or compromise the objectives and interests of the partner organisation and/or Mensen met een MIssie in the country.

Employees adhere to the provisions and agreements as laid down in the Safety Manual as well as in the safety agreements made prior to the working visit.

# 2.11 Compliance with the code of conduct

- 1. All employees have a duty of care to support each other in complying with this code of conduct. In doing so, they can appeal to the confidential adviser.
- 2. The code of conduct is part of the agreement entered into by employees.
- 3. Disciplinary action, including dismissal, may be taken against those who do not comply with the code of conduct. The nature and degree of the measures to be taken are determined by due observance of the procedure as described in the integrity policy (see Chapter 1).
- 4. If an employee unintentionally violates the code of conduct and reports this to his or her supervisor or the programme director when becoming aware of the violation, this will be taken into account when determining the disciplinary measures to be taken or not.

Appendix: Code of conduct for the use of social media

# 3 Risk and sanctions policy Partner Organisations and programme countries

#### 3.1 Introduction

The risk management and sanctioning policy consists of three components:

- 1. pre-assessment of a partner organisation and contracting on an annual basis;
- 2. checking the implementation and implementation reports
- 3. the measures to be taken if the identified risks with regard to fraud, corruption or other misuse of funds or other forms of inadmissible behaviour occur by the partner organisation or one or more of its employees.

## 3.2 Preliminary assessment and financing on an annual basis

# a. <u>Assessment of partner organisation and project application</u>

In the case of a new cooperation relationship, the programme director makes a targeted assessment of the applicant organisation and project application before Mensen met een MIssie enters into an agreement (see, among other things, procedure for accepting new partners). The programme director also assesses the implementation capacity and quality of the proposals and also considers the track record. The programme director can also inquire about the organisation in question within the existing network. The experience of other donors may also be included in the assessment.

Based on the advice of the programme director, the Organisation & Quality manager approves project proposals up to €40,000. The director is authorised to make a decision on project proposals above €40,000. The Director or Manager Organisation & Quality formalises all payment orders.

#### b. Financing on an annual basis

Mensen met een MIssie finances partner organisations on the basis of an annual contract and on the basis of orderly reports. This means that Mensen met een MIssie only legally commits to the organisation on an annual basis. If there is a multi-year cooperation, People with a Mission will draw up follow-up contracts (and thus follow-up payments), depending on the assessment of reports received and the quality and relevance of updated activity plans and budgets and on the available budgetary space.

# 3.3 Monitoring the implementation of the activity plan/successive activity plans during and after the end of the contract period(s)

## a. Audit by examining financial and substantive reports and during working visits

The programme director checks the financial and substantive reports of the partner organisation. The reports are tested on their reality level and reliability. The organisation can also be visited periodically during work visits. During these visits, the programme manager shall hold discussions with

several employees and, if necessary, request access to the financial administration. The programme manager reflects the observations and findings against the reports submitted.

## b. Review by an accountant

For financing above €40,000, an external audit of the expenditures is mandatory. The auditor must meet the recognised professional standards.

### c. Other (external) investigations

Mensen met een Missie may decide to carry out evaluative or audit-oriented research themselves, or instruct external parties to carry out such research.

- 3.4 Measures if there is evidence or reasonable suspicion of fraud, corruption or other misuse of funds or other forms of inadmissible behaviour.
- a. <u>Procedure in case of non-compliant implementation of the agreed-upon activity plan by the partner organisation</u>

If (on the basis of reports provided, during working visits, on the basis of information from third parties or otherwise) it is determined that funds provided by Mensen met een Missie are spent on activities that **do not** follow from the project description and budget submitted with the application, without prior consultation with the relevant programme director of Mensen met een Missie, the reason for the deviation from the agreements made will initially be examined in dialogue with the partner organisation. No further payments will be made to the relevant partner organisation during this dialogue. The partner organisation shall be informed of this in writing.

Not more than one month after the partner organisation answers the questions asked by Mensen met een Missie, Mensen met een Missie will decide whether or not to resume cooperation. If there is reason to do so, an additional (to be performed by an independent, third party) investigation may be initiated by Mensen met een Missie on the basis of the answers given. In the event of a negative outcome, the current agreement will be terminated and any monies paid can be recovered.

In such cases, the programme director will consult with the Organisation & Quality Manager. The Organisation & Quality Manager makes the decision and reports to the Director. If the annual contribution of Mensen met een MIssie exceeds €40,000 the director makes the decision. The partner organisation may lodge an objection to the decision with the Organisation & Quality Manager or the Director. Appeals can be submitted to the director or the board.

b. <u>Procedure for indication for or reasonable suspicion of fraud, corruption or other misuse of funds by (one or more employees of) the partner organisation</u>

The Mensen met een Missie employee who is first confronted with an indication for or reasonable suspicion of fraud, corruption or other misuse of funds reports this immediately to the Organisation & Quality Manager and/or the Director. On the basis of the information provided and the advice of the Organisation & Quality Manager, the Director determines whether the cooperation will be suspended immediately. In the event of outstanding payments, these will also be suspended immediately. If there payments still pending, the Organisation & Quality Manager asks the Finance & Operations department to recover the relevant amounts as far as possible.

If the decision for the above measures has/have been taken, the programme director will inform the partner organisation of this decision in writing within three working days. The programme director reports to the partner organisation that Mensen met een Missie first wants full clarification before resumption of payments and/or cooperation can be considered.

Mensen met een Missie may decide to initiate an independent investigation (to be carried out by a third party) into the alleged fraud, corruption or other misuse of funds.

If the requested clarification is not provided within the given period or not satisfactorily, the director, on the advice of the Organisation & Quality Manager, will determine whether the execution of the agreement will be stopped immediately and the funds provided will be recovered. The partner organisation may object to this decision. The partner organisation may lodge an objection to the decision with the director. Appeals may be submitted to the Board.

There is evidence for or reasonable suspicion of fraud, corruption or other misuse of funds in the event of (non-exhaustive):

- theft or misappropriation of assets belonging to the partner organisation;
- acceptance or offer of bribes or acceptance of gifts or other favours under circumstances that may lead to the conclusion that the gift or favour was intended to influence the decision-making of an employee at the service of the partner organisation;
- blackmail or extortion;
- the deliberate production and/or dissemination of false or misleading financial data.

Mensen met een Missie may make the resumption of funding or relationship contingent on one or more of the following conditions (non-exhaustive):

- the extent of the damage is determined by Mensen met een Missie or a third party;
- the organisation files a report with the police;
- the organisation demonstrably improves the internal organisation/control;
- any 'offenders' will be suspended or dismissed.
- c. <u>Procedure for the indication for or reasonable suspicion of sexual abuse and/or other forms of violence and/or harassment and/or discrimination by (one or more employees of) the partner organisation</u>

The Mensen met een Missie employee who is first confronted with an indication for or reasonable suspicion of sexual abuse and/or other forms of violence and/or harassment and/or discrimination by (one or more employees of) the partner organization, immediately reports this to the Organisation & Quality Manager and/or the Director. On the basis of the information provided and the advice of the Organisation & Quality Manager, the Director determines whether the cooperation will be suspended immediately. In the event of outstanding payments, these will also be suspended immediately. If there payments still pending, the Organisation & Quality Manager asks the Finance & Operations department to recover the relevant amounts as far as possible.

If the decision for the above measures has/have been taken, the programme director will inform the partner organisation of this decision in writing within three working days. The programme director reports to the partner organisation that Mensen met een Missie first wants full clarification before resumption of payments and/or cooperation can be considered.

Mensen met een MIssie may decide to conduct an independent investigation (independent, to be carried out by a third party) into the alleged inappropriate behaviour.

There is evidence for or reasonable suspicion of sexual abuse and/or violence and/or intimidation and/or discrimination (non-exhaustive):

- if someone experiences themselves to be a victim;
- if someone does not feel like a victim, but if the environment sees that there is inequality in the contact in which physical and/or psychological damage (or chance of it) is present.
- if direct or indirect signs of sexual abuse and/or violence and/or harassment and/or discrimination are described by the victim's environment;
- when there is sexual contact in dependency relationships.

The (suspected) sexual abuse and/or violence and/or intimidation and/or discrimination takes place within the sphere and activities of the partner organisation with or between its employees and/or volunteers and/or the target group. A difference in power relations is an important criterion in the assessment of behaviour. The attitude of the organisation towards inappropriate behaviour by one or more of its employees also weighs heavily in the measures taken by Mensen met een MIssie.

Mensen met een Missie may make the resumption of funding or relationship contingent on one or more of the following conditions (non-exhaustive):

- the extent to which the organisation and its management can be accused of negligence;
- the organisation files a report with the police;
- the organisation demonstrably improves the internal culture and clearly indicates what is and is not permissible behaviour;
- any 'offenders' will be suspended or dismissed.

The employee of Mensen met een Missie who reports evidence of or a reasonable suspicion of fraud, corruption or other misuse of funds or other forms of inadmissible behavior by or through (employees of) a partner organization can count on protection and will never experience a negative effect of the report due to the actions of Mensen met een Missie.

# 3.5 Compliance International (financial) sanctions

The nature of the work of Mensen met een Missie means that people often work in fragile countries, war zones, countries with a controversial government or locations where extremist groups can be active.

In order to prevent financing of terrorist and/or criminal organizations or persons, Mensen met een Missie follows the relevant international sanctions lists. Therefore, organisations and/or persons on the international sanctions lists are excluded from funding by Mensen met een Missie.

Mensen met een Missie do this - under the principle of risk sharing with other involved financiers and cooperation partners - by means of:

- Identification of programme countries subject to relevant sanctions.
   This takes place in the 3-monthly safety briefings in which the risks per country are evaluated. If countries are subject to a new sanction, appropriate measures will be taken to comply with the legal requirements regarding the implementation of these sanctions.
- When accepting new partners (see procedure), verification is done whether there
  are penalties for the respective organization and if so, which actions should be
  taken.

Appendix: Procedure for accepting new partner organisation

# 4 Child Safeguarding Policy

#### 4.1 Introduction

Mensen met een MIssie (MM) works towards a world in which people can live in dignity and well-being, a world without violence and injustice. MM works with poor and marginalised people, promoting basic rights, peace and justice, including child rights. We have a zero tolerance approach to child abuse and exploitative child laboratory. We respect children's right to participate, and ensure priority is always given to the best interests of the child. This document describes our policy with regard to child safeguarding practices.

# 4.2 Principles

We recognise the following principles:

- all children have equal rights to protection from harm and exploitative child labour.
- everyone has a responsibility to support the protection of children,
- we have a duty of care to children with whom we work, are in contact with, or who are affected by our work and operations,
- the partner organisations we work with have a responsibility to meet the minimum requirements on protection,
- all actions on child protection are taken in the best interest of the child, which are paramount,
- we adhere to local and international child protection legislation in the countries we work, as well as international laws and conventions in relations to all forms of child abuse and child exploitation.

# 4.3 Definitions

*Child*: The UN Convention on the Rights of the Child defines a child as a person below the age of 18.

Child protection: Child protection refers to the actions that individuals, organisations, countries and communities take to protect children from acts of harm, maltreatment (abuse), and exploitation, e.g. domestic violence, exploitative child laboratory, commercial and sexual exploitation and abuse, deliberate exposure to HIV infection or physical violence.

Child safeguarding: Child safeguarding is the set of policies, procedures and practices that we employ to ensure that Mensen met een MIssie is a child-safe organization. This means that we ensure:

- that anyone who represents our organisation behaves appropriately towards children and never abuses his or her position of trust,
- that everyone associated with our organisation is aware of and responds appropriately to issues of child abuse and the sexual exploitation of children,
- a child-safe environment in our activities by assessing and reducing potential risks to children.

Child abuse: Abuse happens to male and female children and includes physical, sexual and emotional abuse, neglect, bullying, discrimination, child labor and domestic violence. Abuse can be inflicted on a child by men or women, as well as by children and young people themselves.

Child Labor: The International Labour Organisation (ILO) defines' child labour 'as work that deprives children of their childhood, their potential and their dignity, and that is harmful to their physical and mental development. It refers to work that:

- is mentally, physically, socially or morally dangerous and harmful to children, and
- interferes with their schooling by depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessive long and heavy work.

There shall be no recruitment of children and children under 18 years of age; they shall not be employed at night or in hazardous conditions, including any work which is likely to jeopardize children's physical, mental or moral health, safety or morals. This will be ensured in terms of the ILO Convention No. 182 on the Worst Forms of Child Labour (1999) and the ILO Convention No. 138 on the Minimum Age for Admission to Employment and Work (1973), which lists the following minimum age for employment:

	The minimum age at which children can start work	Possible exceptions for developing countries
Hazardous work: Any work which is likely to jeopardize children's physical, mental or moral health, safety or morals should not be done by anyone under the age of 18.	18 (16 under strict conditions)	18 (16 under strict conditions)
Basic Minimum Age: The minimum age for work should not be below the age for finishing compulsory schooling, which is generally 15.	15	14
Light work: Children between the ages of 13 and 15 years old may do light work, as long as it does not threaten their health and safety, or hinder their education or vocational orientation and training.	13-15	12-14.

## 4.4 Scope

This policy applies to all staff of Mensen met een MIssie. In our daily work, staff of Mensen met een MIssie rarely work directly with or are in direct contact with children. However, inherent risks to children may also exist in programs that are not child-focused. For this reason, all employees of Mensen met een MIssie have to be aware of the Child Safeguarding Policy and must sign and follow the Child Safeguarding Code of Conduct.

Our partner organisations, consultants and other associates may be in direct contact with children. Therefore, they are also required to abide by the Child Safeguarding Policy and Child Safeguarding Code of Conduct of Mensen met een MIssie. This requirement is included in the contracts between Mensen met een MIssie and these stakeholders.

# 4.5 Implementation

- Mensen met een MIssie publishes the Child Safeguarding Policy and the Child Safeguarding Code of Conduct on its website. Current employees have to be made aware of this policy and will be informed individually. Mensen met een MIssie communicates this policy to its local partners in the programme countries.
- 2. New staff must read, sign and abide by the Child Safeguarding Code of Conduct. This will be included in the recruitment procedure.
- 3. The Child Safeguarding Policy and the Child Safeguarding Code of Conduct are included as annexes to the contracts between Mensen met een MIssie and its partner organisations, and are an integrated part of this contract.
- 4. All employees are required to report a breach of the Child Safeguarding Code of Conduct by another staff member or a person employed by a partner organisation. This should be reported to the Management of Mensen met een MIssie. If the alleged wrongdoing relates to the conduct of a Director of Mensen met een MIssie, the case should be directly reported to the Chairman of the General Board.
- 5. All reports must be properly investigated by the Director (or General Board's Chairman). During the investigation, the safety of the child involved has to be ensured. In all cases the set-up and outcome of the investigation must be shared with and approved by the General Board of Mensen met een MIssie.
- 6. If a staff member or other associate of Mensen met een MIssie is found to have abused or exploited a child, disciplinary measures will be tasks.
- 7. All information about child protection concerns and reports must be kept confidential, and discussed only with the Board of Directors and the General Board.
- 8. Any allegations which prove to be maliciously or knowingly false, will be considered as a serious punishable offence. Any personal interest must be made known when first raising concerns.
- 9. Any changes in the Child Safeguarding Policy and Code of Conduct of Mensen met een MIssie will be communicated to all staff, partner organizations, consultants and other associates of Mensen met een MIssie.

# **5** Personal data protection policy

# 5.1 Scope

- 1.1 Background to the General Data Protection Regulation (GDPR) The General Data Protection Regulation 2016 replaces the EU Data Protection Directive of 1995 and replaces the legislation of individual Member States developed in accordance with Directive 95/46/EC on data protection. Its purpose is to protect the "rights and freedoms" of natural persons (i.e. living persons) and to ensure that personal data are not processed without their knowledge and, where possible, that they give their consent for it to be processed.
- 1.2 Definitions used by the organisation (derived from the GDPR)

  Material application area (Article 2) the GDPR applies to the processing of personal data in whole or in part by automated means (i.e. with a computer) and to the processing other than by automated data (i.e. paper documents) that are part of an archiving system or are intended to be part of an archiving system.

<u>Territorial application area (Article 3)</u> - the GDPR applies to all controllers established in the EU (EU) who process the personal data of persons concerned in the context of that establishment. It also applies to controllers established outside the EU who process personal data in order to offer goods and services or to monitor behaviour

of persons concerned residing in the EU.

#### 1.3 Article 4 Definitions

<u>Establishment</u> - the main establishment of the controller in the EU is the place where the controller takes the most important decisions about the purpose and means of its data processing activities. The main establishment of a processor in the EU is its head office. If a controller is established outside the EU, it must appoint a representative in the jurisdiction in which the controller operates to act on behalf of the controller and to liaise with the supervisory authorities.

<u>Personal data</u> - any information about an identified or identifiable natural person ("the concerned party"); as identifiable is considered a natural person who can be identified, directly or indirectly, in particular by means of an identifier such as a name, an identification number, location data, online identifier or one or more elements that are characteristic of the physical, physiological, genetic, psychological, economic, cultural or social identity of that natural person;

<u>Special categories of personal data</u> - personal data that reveal racial or ethnic origin, political opinions, religious or philosophical beliefs, or the membership of a trade union, and the processing of genetic data, biometric data for the purpose of the unique

identification of a person, or health data, or data relating to a person's sexual behavior or sexual orientation.

<u>Controller</u>- a natural person or a legal entity, a government agency, service or other body who/that, alone or together with others, determines the purpose of and means for processing personal data; when the objectives of and means for such processing are established in Union or member state law, they may determine who the controller is or the criteria for designating them;

<u>Concerned party</u> - any living person whose personal data is held by an organisation.

<u>Processing</u> - an operation or a set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as the collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

<u>Profiling</u> - any form of automated processing of personal data in which certain personal aspects of a natural person are evaluated on the basis of personal data, in particular with the aim of analysing or predicting their professional performance, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

<u>A personal data breach</u> - a breach in security which inadvertently or unlawfully leads to the destruction, loss, modification or unauthorised dissemination of or unauthorised access to transferred, stored or otherwise processed data. The controller is obliged to report personal data breaches to the supervisory authority if the breach is likely to have a negative effect on the personal data or privacy of the concerned party.

<u>Consent of the concerned party</u> - any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data;

<u>Child</u> - the GDPR defines a child as someone under the age of 16, although this can be reduced to 13 by the legislation of the Member State. The processing of personal data of a child is only lawful if the consent of the parent or custodian has been obtained. In such cases, the controller shall make every effort to verify whether the holder of parental responsibility for the child grants or authorises permission.

<u>Third party</u> - a natural or legal person, public authority, agency or other body other than the concerned party and the

the controller, nor the processor, nor the persons authorised under the direct authority of the controller or the processor to process the personal data.

<u>File</u> - Any structured set of personal data that is accessible according to certain criteria, regardless whether it is entirely centralised or decentralised or has been disseminated on functional or geographical grounds.

# **5.2** Policy Disclosure

- 2.1 The Supervisory Board and the Board and further management of Mensen met een Missie, located at Bezuidenhoutseweg 225, The Hague, are committed to complying with all relevant EU and national legislation regarding personal data and the protection of the "rights and freedoms" of persons whose information is collected by Mensen met een Missie and processes in compliance with the General Data Protection Regulation (GDPR)
- 2.2 Compliance with the GDPR is described in this policy document and other relevant policies such as the Information security policy, together with related processes and procedures.
- 2.3 The GDPR and this policy apply to all functions for the processing of personal data of the Mensen met een Missie, including those carried out on personal data of donors, sponsors, customers, employees, volunteers, suppliers and partners, and all other personal data that the organisation processes from any source.
- 2.4 The GDPR owner (Organisation and Quality Manager) is responsible for the annual review of the processing register in light of any changes in the activities of Mensen met een Missie (as determined by changes in the register of data inventories and the management evaluation) and in any additional requirements established through data protection and impact assessments. This register must be available at the request of the supervisory authority.
- 2.5 This policy applies to all employees [and stakeholders] of Mensen met een Missie, such as suppliers. Any violation of the GDPR or these PIMS will be dealt with under the disciplinary policies of the Organisation and may also be a criminal offense, in which case the matter will be referred to the competent authorities.
- 2.6 Partners and third parties who work with or for Mensen met een Missie and who have or may have access to personal data are expected to have read and understood this policy, and will work in accordance with this policy. Third parties cannot gain access to personal data held by Mensen met een Missie without first entering into a data secrecy agreement [document reference], which means that the obligations of third parties are no less than those to which Mensen met een Missie is committed, and which gives Mensen met een Missie the right to verify compliance with the agreement.

# 5.3 Responsibilities and roles under the GDPR

3.1 Mensen met een Missie is a controller under the GDPR. Mensen met een MIssie has a controller instead of a data protection officer because Mensen met een MIssie only processes personal data on a limited scale and does not track or store any special personal data (except for the usual personal data of employees).

This means that Mensen met een Missie does not fall into one of the three categories that are required (Article 37 of the GDPR): to have an FG. To wit: 1) Governments and public organisations, 2) Organisations that monitor individuals on a large scale or chart their activities based on their core activities. 3) Organizations that process special personal data on a large scale and for whom this is a core activity.

Given the relatively simple data that are stored and which mainly only concern basic data of donors and interested parties, the choice was made to pay more attention to reviewing the processes and emphasising the service orientation within the organization. Only in this way can we ensure that donors and interested parties feel welcome and feel safe with Mensen met een Missie.

- 3.2 Management and all those in managerial or supervisory positions in Mensen met een Missie are responsible for developing and encouraging correct procedures for data processing within the Naam of Organisation; responsibilities are set forth in individual job descriptions.
- 3.3 GDPR Controller, a role defined in the GDPR, must be a member of the senior management team, is accountable to the Board of Directors of Mensen met een Missie for the Management of Personal Data within Mensen met een Missie and to ensure that compliance with data protection legislation can be demonstrated. This responsibility entails:
  - development and implementation of the GDPR as required by this Policy; and
  - security and risk management related to policy compliance.
- 3.4 The GDPR Controller, considered to be sufficiently qualified and experienced, is appointed to assume the day-to-day responsibility for compliance with this policy of the organisation and has in particular the direct responsibility to ensure that Mensen met een Missie complies with the GDPR, as well as supervisors with regard to data processing that takes place within their area of responsibility.
- 3.5 The GDPR Controller has specific responsibilities regarding procedures such as the procedure for requesting access and is the first point of contact for employees/staff seeking clarification on compliance with data protection.
- 3.6 Compliance with data protection legislation is the responsibility of all employees of Mensen met een Missie who process personal data.
- 3.7 Employees of Mensen met een Missie are responsible for ensuring that all personal data about those that are provided by them to Mensen met een Missie are accurate and up to date.

# 5.4 Data protection principles

All processing of personal data must be carried out in accordance with the data protection principles as set out in Article 5 of the GDPR. The Policies and Procedures of Mensen met een Missie are designed to ensure compliance with the principles.

4.1 Personal data must be processed lawfully, fairly and transparently.

Legitimate - identify a lawful basis before personal data can be processed. These are often referred to as the "conditions for processing", for example consent.

Appropriate - in order for the processing to be fair, the controller must make certain information available to the concerned parties as practically as possible. This applies irrespective of whether the personal data were obtained directly from the concerned parties or from other sources.

The GDPR sets more requirements on what information should be available to concerned parties which is covered under 'Transparent'.

Transparent - the GDPR contains rules for providing privacy information to concerned parties in Articles 12, 13 and 14. These are detailed and specific, with an emphasis on making the privacy statement understandable and accessible. Information must be provided to the concerned parties in an intelligible form, in clear language.

The specific information to be provided to the concerned party shall include at least the following:

- 4.1.1 the identity and contact details of the controller and, if available, of the controller's representative;
- 4.1.2 the contact details of the GDPR Controller;
- 4.1.3 the purposes of the processing and the legal basis for the processing;
- 4.1.4 the period during which the personal data are stored;
- 4.1.5 the right of the concerned party to request access, rectification, erasure or objection to processing, and the conditions (or lack thereof) relating to the exercise of these rights, such as whether the legality of previous processing will be affected;
- 4.1.6 categories of personal data;
- 4.1.7 the recipients or categories of recipients of the personal data, if applicable;
- 4.1.8 where applicable, that the controller intends to transfer personal data to a recipient in a third country and the level of protection afforded to the data;
- 4.1.9 all further information necessary to guarantee proper processing.
- 4.2 <u>Personal data can only be collected for specific, explicit and legitimate purposes.</u>

Data obtained for specified purposes shall not be used for another purpose if this is incompatible with the original purpose.

- 4.3 Personal data must be accurate, relevant and limited to what is necessary for processing.
  - 4.3.1 The GDPR owner is responsible for ensuring that Mensen met een Missie does not collect information that is not strictly necessary for the purpose for which it was obtained.
  - 4.3.2 All data collection forms (electronic or paper), including requirements for the collection of data in new information systems, must contain an appropriate processing statement or link to the privacy statement and have been approved by the GDPR owner.
  - 4.3.3 The GDPR owner shall ensure that all data collection methods are reviewed on an annual basis by [internal audit/external experts] to ensure that the data collected is adequate, relevant and not excessive.
- 4.4 Personal data must be accurate and on request be updated, deleted or corrected.
   4.4.1 Data stored by the controller must be reviewed and, if necessary, updated. No data may be processed unless it can reasonably be assumed that it is correct
  - 4.4.2 The Data Protection Officer is responsible for ensuring that all personnel are trained in the importance of collecting and maintaining accurate data.
    4.4.3 It is also the responsibility of the concerned party to ensure that the data held by Mensen met een Missie is accurate and up to date. When completing a
  - held by Mensen met een Missie is accurate and up to date. When completing a registration or application form by a concerned party, the concerned party declares that the information contained therein is correct at the date of submission.
  - 4.4.4 Employees/donors must notify Mensen met een Missie of any changes in circumstances to ensure that personal data can be updated accordingly. It is the responsibility of Mensen met een Missie to ensure that any notice of a change of circumstances is recorded and acted upon.
  - 4.4.5 The GDPR owner is responsible for ensuring that appropriate procedures and policies are in place to keep personal data accurate and up to date, taking into account the amount of data collected, the rate at which this can change and any other relevant factors.
  - 4.4.6 At least annually, the data protection officer/GDPR owner will evaluate the retention periods of all personal data
  - processed by Mensen met een Missie, against the data inventory and identify data that are no longer required in the data inventory in the context of the registered purpose. These data are securely deleted/destroyed.
  - 4.4.7 The GDPR owner is responsible for responding to requests for rectification of data subjects within one month. This can be extended by an additional two months for complex requests. If Mensen met een Missie decides not to comply with the request, the GDPR owner must respond to the party concerned to explain his reasoning and to inform them of

their right to lodge a complaint with the supervisory authority and to request a remedy.

4.4.8 The GDPR owner is responsible for making appropriate arrangements in order to, when third party organisations may have transmitted incorrect or outdated personal data, notify them that the information is incorrect or outdated and may not be used; and for forwarding any correction of the personal data to a third party where this is required.

- 4.5 Personal data must be kept in such a form that the concerned party can only be identified for as long as this is necessary for processing.
  - 4.5.1 When personal data are kept for longer than necessary for processing purposes, it is minimised/encrypted/pseudonymised to protect the identity of the concerned party in the event of a data breach.
  - 4.5.2 Personal data will be kept in accordance with the record retention procedure and, once the retention period has expired, it must be securely destroyed as set out in this procedure.
  - 4.5.3 The GDPR owner must specifically consent to any retention of data that is longer than the retention periods set out in the processing register, and must ensure that the justification can be clearly adduced and is in line with the legislation on

data protection. This approval must be documented.

# **Annex 1: GDPR Personal User Agreement**

I accept that the access rights defined in this Agreement have been granted to me in respect of the means of information also specified in this Agreement. I understand and accept the rights granted, I understand the organisational reasons for these access rights and I understand that if they are violated, and in particular any attempt to access services or information that I am not authorized to - including any attempt to read, copy, modify or delete personal data without prior consent - may result in disciplinary action and specific sanctions. I also agree with the Privacy Policy and will comply with it. I understand that failure to comply with this Agreement or to commit information security breaches may result in disciplinary action by Mensen met een Missie.

#### **Passwords**

2.1	My username and password will be issued in accordance with the
	procedure for Mensen met een Missie.
2.2	I will select and use passwords that are at least 6 characters long and
	alphanumeric.
2.3	I will keep my password secret.
2.4	I will change my password at intervals as required by Mensen met een Missie,
	will not reuse passwords, and will change my password more often if there is
	evidence of a potentially compromised system or
	password.

# Clear desk policy, screensavers and information reproduction

- I understand that I must ensure that no confidential information (in the form of paper or portable storage media) is left on my desk, in my environment, or left in reproduction equipment (photocopiers, fax machines, scanners) when I am not present and will ensure that such information is secured in accordance with the security requirements of Mensen met een Missie.
   I understand that I need to make sure that no one has access to my
  - .2 I understand that I need to make sure that no one has access to my workstation if I am not present and that I lock my workstation when I leave my workplace.

#### **Software**

- 4.1 To the extent possible, I will ensure that no attempts are made to disable or bypass the installed software of Mensen met een Missie, including anti-malware software, firewalls and automatic update services. I report potential incidents immediately to the IT employee of Mensen met een Missie
- 4.2 I accept that I cannot download software from the Internet on any computer/laptop of Mensen met een Missie and that I may not install software for which Mensen met een Missie has no valid license and for which no prior permission has been obtained from the IT employee.

# **Data protection and legislation**

- 5.1 I will only store the personal data (mine or someone else's) on the previously assigned personal disk or OneDrive of the organisation.
- 5.2 I will ensure that I comply with all legal requirements relating to my computer usage, including privacy and data protection rules.

#### **Maintenance**

6.1 I accept that I am responsible for the physical security of my workstation and will immediately report any errors to the personnel management employee.

# **Revocation and modification of access rights**

7.1 I understand and accept that failure to comply with the above-mentioned data protection agreements may result in disciplinary action. Failure to comply can also lead to the restriction or total denial of access rights, all depending on the judgment of the management.

# **Annex 2: Mensen met een Missie - Child Safeguarding Code of Conduct**

I recognize that I have read and understand the Child Safeguarding Policy of Mensen met een MIssie.

I agree that in the course of my association with Mensen met een MIssie, I must:

- treat children with respect regardless of race, color, gender, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status,
- not use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate,
- not engage children under the age of 18 in any form of sexual intercourse or sexual activity, including paying for sexual services or acts,
- wherever possible, ensure that another adult is present when working in the proximity of children,
- not invite unaccompanied children into my home, unless they are at immediate risk of injury or in physical danger,
- not sleep close to unsupervised children unless absolutely necessary, in which case I
  must obtain my supervisor's permission and ensure that another adult is present if
  possible
- use any computers, mobile phones, video cameras, cameras or social media appropriately, and never exploit or harass children or access child exploitation material through any medium,
- not use physical punishment on children,
- not hire children for domestic or other laboratory which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury,
- comply with all relevant legislation, including laboratory laws in relation to child laboratory,
- immediate report concerns or allegations of child exploitation and abuse and policy non-compliance in accordance with appropriate procedures,
- immediately disclose any charges, convictions and other outcomes of an offence which relate to child exploitation or abuse, and which occurred before or occurs during my association with Mensen met een MIssie.

When photographing or filming a child or using children's images for work-related purposes, I must:

- assess and endeavor to comply with local traditions or restrictions for reproducing personal images before photographing or filming a child,
- obtain informed consent from the child and parent or guardian of the child before photographing or filming a child. As part of this I must explain how and for what purpose the photograph or film will be used,
- ensure that photographs, films, videos and DVDs present children in a dignified and respectful manner, and not in a vulnerable or submissive manner. Children should be properly clothed and not in poses that could be seen as sexually suggestive,
- ensure that images are honest representations of the context and the facts,
- ensure that file labels, meta data or text descriptions do not reveal identifying information about a child when sending images electronically or publishing images in any form, if permission from a parent/guardian has not been granted.

I declare that I have never been convicted of any offence involving any type of harm to a child or children, nor have I ever been warned or cautioned in relation to such a matter. I

also declare that there are no civil or criminal proceedings of any nature pending against me at the date of my signing the General Code of Conduct of Mensen met een MIssie relating to any allegation concerning any type of harm to a child or children.

This is not an exhaustive or exclusive list. I understand that the onus is on me, as a person associated with Mensen met een MIssie, to use common sense and avoid actions or behavior that could be construed as child exploitation and abuse.

Signing to the General Code of Conduct or a contract with Mensen met een MIssie commits the signatory to the expected appropriate behavior, which is based on the Child Safeguarding Policy and Child Safeguarding Code of Conduct of Mensen met een MIssie.

#### Annex 3: Code of Conduct for the Use of Social Media

#### Introduction

Many of the staff and other employees of Mensen met een MIssie use social media in their private lives. Since work is an important part of our lives, it is very likely that Mensen met een MIssie is sometimes mentioned in these private accounts. If you use the name Mensen met een MIssie, you should realize that you represent Mensen met een MIssie at that time. Social media creates huge social networks that can be activated very quickly without anyone having control over them. A message can be powerful and positive,

but can also have negative consequences for the organisation or our beneficiaries. Moreover, the Internet never forgets anything, even if you erase the content. So be careful what you put on it.

The variety of social media is huge. Popular sites and apps at the moment include Facebook, Instagram, WhatsApp, Twitter, LinkedIn, YouTube, Flickr, Blogspot, and so on.

This Code of Conduct is an appendix to the Code of Conduct. By signing the Code of Conduct, you also agree to comply with this Code of Conduct for the use of social media.

In the event of a violation of the guidelines, the Board of Mensen met een MIssie take measures. See the steps in the Integrity Policy (Chapter 1).

#### Why is caution required?

There are three major risks associated with using social media:

- 1. *Privacy risk*; Social media messages may infringe the privacy of others, such as colleagues or beneficiaries;
- security risk; Messages on social media can pose a threat to the own safety or the safety of other staff, partners and beneficiaries, or for the possibility of Mensen met een MIssie to continue the implementation of programmes in a country;
- 3. *image risk*; Social media communications are public, not private, and can easily become unmanageable. Social media posts can easily be misunderstood or taken out of context by people who don't understand the challenges of missionary development work, and can be used to criticize Mensen met een MIssie.

#### **Guidelines**

The following nine guidelines are designed to help avoid pitfalls and maximise the positive benefits of communicating about Mensen met een Missie through social media:

## 1. Be an ambassador for Mensen met een Missie

Private and professional life must not be mixed in such a way as to discredit Mensen met een Missie.

If you are posting content online, even if it is only for family and friends, be aware that you are operating in the public domain and that you must act as an ambassador for Mensen met een Missie. And verify the news from social media before you spread it (or even retweet it). Think of social media as a tipster, not a reporter.

## 2. Adhere to the core values of Mensen met een Missie

If you post something on social media, even if you use private separate social media accounts, always respect the core values of Mensen met een Missie: human dignity, promotion of the public interest, subsidiarity and solidarity. This means, among other things, that denigrating, discriminatory, sexist and racial references and/or personal insults are not permitted, and that staff and other employees must refrain from conduct that is not acceptable to Mensen met een Missie or is not in accordance with its core values.

## 3. Never share security and confidential information

Think of social media as unsafe and act accordingly. Do not publish any security information or any confidential or otherwise sensitive information (such as email addresses, physical addresses, phone numbers, travel schedules, incidents, and personal information of local partners' staff).

Do not disclose your exact physical location on social media. Disable GPS options in Twitter, Facebook, and the like, and make sure photos don't contain identifying information.

#### 4. Respect the people we serve

Due to the context in which Mensen met een MIssie operates, the beneficiaries and staff of local partners may have a different perception of social media. In this regard, the staff and other employees of Mensen met een MIssie must treat the people we serve with the dignity they deserve and respect their right to privacy. Never take photos or videos without the consent of the person themselves or the parents/guardians (in the case of children). This applies to images that are for personal use only, but even more so for photos and videos that are intended for public

communication. In all cases, the dignity of the persons depicted must be fully respected, and the focus must be on positive images. If in doubt, do not post photos or videos.

## 5. Be careful when posting personal information

Do not post personal information about anyone else (such as name and photo) without that person's explicit consent. Make a critical assessment of the security risks of the person, even if he/she gives permission for the posting of the information. Be aware that there are many cultural contexts in which people do not easily say no to direct requests.

- **6. Be cautious in expressing political and religious views** Staff and other staff of Mensen met een Missie should be aware that topics may be offensive, inflammatory or harmful to others
- . However, it is important that you are very restrained about political or religious issues in the programme countries on behalf of Mensen met een Missie. In addition, you may only express your personal views on politics or religion in a programme country you are visiting with great prudence and vigilance.

Social media can certainly play a role in critical awareness, but you need to ask yourself if your message may cause harm to the beneficiaries, partners or Mensen met een Missie. If there is a conflict of interest, discuss this with your manager.

# 7. Respect local partners, donors and fellow organizations

Our work with local partners is based on mutual respect and commitment. In this context, messages may not be published that pose a threat or have negative consequences for the partners or Mensen met een Missie, or for other missionary and development organisations and for donors.

## 8. Refer to press inquiries

Social media content about Mensen met een Missie can generate media attention. If you are approached directly by the media, do not provide information but refer to the designated spokesperson.

## 9. Use your common sense

Any content posted online may be misused, misinterpreted or used in contexts that may jeopardize the work and reputation of Mensen met een Missie. Before posting a message, document, or photo, first consider what the consequences may be for the organisation, using your common sense. If in doubt, do not post the message, document or photo until you have spoken to your supervisor.

This document is inextricably linked to the terms of employment applicable to staff and other employees of Mensen met een Missie. All employees of Mensen met een Missie will be provided with a copy of the Code of Conduct.

# **Annex 4: Acceptance of policies and code of conducts**

I hereby declare that I have read and will comply with the following policy documents. I also understand that non-compliance can lead to sanctions, whether or not described in the aforementioned documents.

- 1) Integrity Policy for Mensen met een MIssie
- 2) Code of Conduct for employees, missionaries, trainees and volunteers of Mensen met een MIssie
- 3) Risk and sanctions policy Partner Organisations and programme countries
- 4) Child Safeguarding Policy
- 5) Data protection policy I also

hereby sign the

a) GDPR Personal User Agreement for the following applications and data:

Use of data	
	Use of data

b) Code of conduct for the use of social media
Name:
Date:
Signature