



ORGANISATIONAL POLICIES

Transparency and Compliance Framework

EMDAD

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About This Document

EMDAD makes its organisational policies publicly available as part of our commitment to transparency and accountability. These policies govern the conduct of all EMDAD staff, consultants, partners, and subcontractors and are aligned with international humanitarian standards, including the Core Humanitarian Standard (CHS), Sphere Standards, and relevant UK legislation.

These policies are reviewed annually or when significant changes occur in legislation, operational context, or organisational structure. All personnel are required to read, understand, and comply with these policies as a condition of engagement.

If you have questions about any of these policies or wish to report a concern, please contact us at info@emdad.uk.

1. Code of Conduct

Policy	Code of Conduct
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1.1 Purpose

This Code sets out the standards of behaviour expected of everyone working for or on behalf of EMDAD, including staff, consultants, volunteers, and subcontractors.

1.2 Core Commitments

All EMDAD personnel shall:

- **Act with integrity**, honesty, and professionalism at all times
- **Respect the dignity**, rights, and cultural practices of all individuals, particularly beneficiaries of humanitarian assistance
- **Uphold humanitarian principles** of humanity, neutrality, impartiality, and independence
- **Never engage in** any form of exploitation, abuse, harassment, or discrimination
- **Never accept or offer** bribes, kickbacks, or improper inducements
- **Protect confidential information** and use organisational resources responsibly
- **Report any concerns** about misconduct, fraud, or safeguarding issues through the appropriate channels
- **Comply with all** applicable laws in the UK and in countries of operation

1.3 Use of Authority

Personnel must never use their position to gain personal advantage or to exploit the vulnerability of beneficiaries, partners, or colleagues. The power imbalance inherent in humanitarian work demands the highest standards of ethical conduct.

1.4 Consequences of Breach

Violations of this Code may result in disciplinary action up to and including termination of engagement and, where appropriate, referral to law enforcement authorities.

2. Safeguarding and PSEA Policy

Policy	Safeguarding and Protection from Sexual Exploitation and Abuse
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2.1 Purpose

EMDAD has zero tolerance for sexual exploitation, sexual abuse, and all forms of harm against children, vulnerable adults, and beneficiaries. This policy sets out our commitment and the measures in place to prevent, detect, and respond to safeguarding concerns.

2.2 Scope

This policy applies to all EMDAD staff, consultants, partners, subcontractors, and anyone acting on EMDAD's behalf, in all locations and at all times — including outside working hours where conduct could affect beneficiaries or EMDAD's reputation.

2.3 Definitions

- **Sexual Exploitation:** Any abuse of a position of vulnerability, power, or trust for sexual purposes, including profiting monetarily, socially, or politically from the sexual exploitation of another
- **Sexual Abuse:** Any actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions
- **Child:** Any person under the age of 18, regardless of local laws on the age of majority

2.4 Standards of Conduct

All personnel must:

- **Never engage in sexual exploitation or abuse of beneficiaries or community members**
- **Never engage in sexual activity with children (under 18), regardless of local age of consent**
- **Never exchange money, goods, services, employment, or assistance for sex or sexual favours**
- **Report all safeguarding concerns immediately, even if based on suspicion**
- **Cooperate fully with any investigation into safeguarding allegations**

2.5 Safer Recruitment

EMDAD conducts background checks, reference checks, and screening for all personnel before engagement. Candidates with a history of safeguarding violations shall not be engaged.

2.6 Reporting

All concerns must be reported to the designated Safeguarding Focal Point or via the confidential reporting email at info@emdad.uk. External parties, including beneficiaries, community members, and partner organisations, are equally encouraged to report concerns through this channel.

EMDAD will investigate all reports promptly and confidentially, with a survivor-centred approach. Retaliation against anyone reporting in good faith is strictly prohibited.

3. Anti-Fraud and Anti-Corruption Policy

Policy	Anti-Fraud and Anti-Corruption
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3.1 Purpose

EMDAD is committed to conducting all business with honesty and integrity. This policy sets out our zero-tolerance approach to fraud, bribery, and corruption in any form.

3.2 Legal Framework

This policy is aligned with the UK Bribery Act 2010, the Fraud Act 2006, the Proceeds of Crime Act 2002, and applicable anti-corruption laws in countries of operation.

3.3 Prohibited Conduct

The following are strictly prohibited:

- **Bribery:** Offering, giving, soliciting, or accepting any payment, gift, or favour to influence a business decision or secure an improper advantage
- **Fraud:** Any deliberate act of deception, misrepresentation, or concealment intended to result in financial or personal gain
- **Kickbacks:** Payments or benefits to or from suppliers, partners, or officials in exchange for favourable treatment
- **Facilitation payments:** Unofficial payments to speed up routine government actions, regardless of local practice
- **Money laundering:** Processing or disguising proceeds of criminal activity

3.4 Gifts and Hospitality

Personnel must not accept or offer gifts, hospitality, or favours that could reasonably be perceived as intended to influence business decisions. Modest hospitality consistent with local custom is acceptable provided it is declared and recorded. Any gift exceeding GBP 25 in value must be reported to the Finance Officer.

3.5 Due Diligence

EMDAD conducts proportionate due diligence on all partners, suppliers, and subcontractors before entering into agreements, including screening against relevant sanctions lists and assessing corruption risk.

3.6 Detection and Response

Suspected fraud or corruption must be reported immediately through the channels set out in the Whistleblowing Policy. All reports will be investigated. Where fraud or corruption is confirmed, EMDAD will take disciplinary action, report to donors as required, seek recovery of funds, and refer matters to law enforcement where appropriate.

4. Whistleblowing and Reporting Policy

Policy	Whistleblowing and Reporting
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4.1 Purpose

EMDAD encourages all personnel, partners, beneficiaries, community members, and any third parties to report concerns about wrongdoing without fear of retaliation. This policy provides safe, accessible, and confidential channels for reporting.

4.2 What to Report

Reportable concerns include but are not limited to:

- **Fraud, theft, financial mismanagement, or corruption**
- **Sexual exploitation, abuse, or harassment**
- **Safeguarding concerns involving children or vulnerable adults**
- **Discrimination or bullying**
- **Health and safety violations**
- **Breach of any EMDAD policy or the Code of Conduct**
- **Any conduct that endangers beneficiaries, staff, or the organisation's integrity**

4.3 Reporting Channels

- **Direct report** to the line manager or any senior staff member
- **Email:** info@emdad.uk (dedicated and monitored independently)
- **Written report** marked "Confidential" addressed to the Managing Director

Reports may be made anonymously. External parties — including beneficiaries, community members, donors, and partner organisations — are welcome to use the reporting email address above. Where possible, reporters are encouraged to provide their identity to enable effective investigation, with assurance of confidentiality.

4.4 Protection from Retaliation

EMDAD strictly prohibits any form of retaliation, victimisation, or adverse treatment of anyone who reports a concern in good faith. Any person found to have retaliated against a reporter will face disciplinary action.

4.5 Investigation

All reports will be acknowledged promptly, assessed for severity, and investigated in a timely and proportionate manner. The reporter will be informed of the outcome to the extent possible while maintaining confidentiality. Serious matters will be referred to relevant authorities and donors as required.

5. Conflict of Interest Policy

Policy	Conflict of Interest
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5.1 Purpose

This policy requires all personnel to identify, declare, and manage situations where personal interests could conflict with, or appear to conflict with, their duties and responsibilities to EMDAD and its clients.

5.2 What Constitutes a Conflict

A conflict of interest arises when a person's private interests — financial, familial, or personal — could improperly influence, or could reasonably be perceived to influence, their professional judgement or decisions. Examples include:

- **A financial interest in a supplier, partner, or competitor of EMDAD**
- **A family or close personal relationship with someone involved in a procurement, recruitment, or contracting decision**
- **Outside employment or consultancy that could compete with or affect EMDAD's work**
- **Accepting gifts, hospitality, or favours that could influence decision-making**

5.3 Declaration

All personnel must declare any actual, potential, or perceived conflict of interest at the earliest opportunity by submitting a written declaration to the Managing Director or Finance Officer. Declarations will be recorded in a Conflict-of-Interest Register.

5.4 Management

Where a conflict is identified, EMDAD will determine appropriate action, which may include recusal from specific decisions, reassignment of responsibilities, or divestment of the conflicting interest. Personnel must comply with the measures determined.

5.5 Procurement

Any person involved in procurement or contracting who has a connection to a prospective supplier must declare the interest and recuse themselves from the evaluation and decision-making process.

6. Data Protection and Privacy Policy

Policy	Data Protection and Privacy
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6.1 Purpose

EMDAD is committed to protecting the personal data of beneficiaries, staff, partners, and all individuals whose data we process. This policy sets out how we collect, use, store, and protect personal data in compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and humanitarian data protection principles.

6.2 Principles

All data processing shall be:

- **Lawful, fair, and transparent**
- **Collected for specified, explicit, and legitimate purposes**
- **Adequate, relevant, and limited to what is necessary**
- **Accurate and kept up to date**
- **Stored only for as long as necessary**
- **Processed securely with appropriate technical and organisational measures**

6.3 Beneficiary Data

EMDAD recognises the particular vulnerability of humanitarian beneficiaries and applies enhanced protections to their data. Beneficiary data shall only be collected with informed consent (or another lawful basis), stored securely, shared only with authorised parties for the purposes of programme delivery, and anonymised or deleted when no longer required.

6.4 Data Sharing

Personal data shall only be shared with third parties where there is a lawful basis, a legitimate operational need, and appropriate data sharing agreements are in place. Data shall never be sold or shared for commercial purposes.

6.5 Security

EMDAD implements appropriate measures to protect data, including encrypted storage and transmission, access controls and password policies, regular backups, and staff training on data handling responsibilities.

6.6 Your Rights

Individuals whose personal data EMDAD processes have the right to request access to their data, request correction of inaccurate data, request deletion where appropriate, and object to processing. Requests should be directed to info@emdad.uk and will be responded to within 30 days.

6.7 Breach Notification

Any suspected data breach must be reported immediately to the Managing Director. Where required, EMDAD will notify the Information Commissioner's Office (ICO) within 72 hours and inform affected individuals without undue delay.

7. Procurement Policy

Policy	Procurement
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7.1 Purpose

This policy governs the procurement of goods, services, and works by EMDAD, whether for its own operations or on behalf of clients. It ensures that all procurement is conducted fairly, transparently, and in compliance with donor requirements and applicable laws.

7.2 Principles

- **Value for money:** Achieving the best combination of quality and cost to meet project needs
- **Transparency:** Clear, documented processes at every stage
- **Fair competition:** Equal opportunity for qualified suppliers to compete
- **Accountability:** Complete audit trail from requisition to delivery
- **Ethical conduct:** No conflicts of interest, bribery, or favouritism

7.3 Documentation

All procurement decisions shall be fully documented, including purchase requisitions, quotations/bids received, evaluation criteria and scoring, selection justification, purchase orders or contracts, delivery receipts and inspection records, and invoices and proof of payment.

7.4 Supplier Due Diligence

EMDAD conducts appropriate due diligence on all suppliers, including verification of legal registration, screening against sanctions lists, and assessment of capacity to deliver. Preferred supplier lists are reviewed annually.

8. Health, Safety and Security Policy

Policy	Health, Safety and Security
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8.1 Purpose

EMDAD is committed to ensuring the health, safety, and security of all personnel, partners, and beneficiaries in all operating environments. Given the nature of humanitarian work in crisis-affected contexts, robust safety and security management is essential.

8.2 Responsibilities

- **EMDAD** will assess and manage risks in all operating locations, provide appropriate security briefings and equipment, maintain emergency communication systems, and ensure access to medical support
- **Personnel** must follow all security protocols, report incidents and concerns immediately, attend mandatory security briefings, and avoid unnecessary risk-taking

8.3 Risk Assessment

Before commencing operations in any location, EMDAD will conduct a security risk assessment and develop a country-specific security plan. Risk assessments are reviewed regularly and updated in response to changing conditions.

8.4 Incident Management

All safety and security incidents must be reported immediately. EMDAD maintains an incident reporting system and will investigate all incidents, implement corrective actions, and notify relevant authorities and clients as appropriate.

8.5 Duty of Care

EMDAD recognises its duty of care to all personnel deployed to the field and ensures appropriate insurance coverage, evacuation plans, psychosocial support, and rest and recuperation arrangements.

9. Equal Opportunities and Anti-Discrimination Policy

Policy	Equal Opportunities and Anti-Discrimination
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9.1 Purpose

EMDAD is committed to providing equal opportunities in employment and service delivery and to creating a working environment free from discrimination, harassment, and victimisation.

9.2 Protected Characteristics

In accordance with the Equality Act 2010, EMDAD prohibits discrimination on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

9.3 Application

This policy applies to all aspects of employment including recruitment, selection, training, promotion, pay, and termination, as well as to all interactions with beneficiaries, partners, and community members.

9.4 Harassment and Bullying

EMDAD has zero tolerance for workplace harassment and bullying in any form, including physical, verbal, or online conduct. All complaints will be taken seriously, investigated, and addressed.

9.5 Reasonable Adjustments

EMDAD will make reasonable adjustments to support personnel with disabilities and will actively promote diversity and inclusion in its workforce and in programme design and delivery.

10. Environmental and Social Responsibility Policy

Policy	Environmental and Social Responsibility
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10.1 Purpose

EMDAD recognises its responsibility to minimise the environmental impact of its operations and to contribute positively to the communities in which it works.

10.2 Environmental Commitments

- **Minimise waste, energy consumption, and carbon emissions across all operations**
- **Prioritise local and sustainable procurement where possible**
- **Avoid activities that cause unnecessary environmental degradation**
- **Comply with environmental regulations in all countries of operation**
- **Consider environmental impact in project design and implementation**

10.3 Social Commitments

- **Prioritise local hiring and capacity building in communities where we operate**
- **Ensure community engagement and participation in project design**
- **Respect local customs, culture, and traditions**
- **Contribute to sustainable development outcomes beyond immediate project objectives**
- **Apply a do-no-harm approach to all activities**

10.4 Monitoring

EMDAD will monitor and report on its environmental and social performance and seek to continuously improve its practices.

Contact Us

General enquiries: info@emdad.uk

Website: www.emdad.uk

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