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## **ETHIC CODE**

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Social Promotion Foundation

## 1) INTRODUCTION

The greater frequency of humanitarian crises associated with armed conflict, poverty, natural disasters or climate change together with the proliferation of actors that take part in humanitarian aid (both donors and aid workers) make it imperative to develop an action strategy in this sector to clarify and establish principles to control the activity of the Social Promotion Foundation in this area.

In 2003 the set of donors established common principles so that humanitarian action could achieve its goals in an effective way. The so-called “*Good Humanitarian Donorship Initiative*”, which Spain joined in 2004, was a milestone in the donor community. It defined the common values and criteria that our actions should follow.

The *Humanitarian Donorship Strategy in the Social Promotion Foundation* is essentially based on the **Act 23/1998, of 7 July**, on International Development Cooperation. It incorporates humanitarian considerations from laws, treaties, and agreements — international and regional— in the framework of the Humanitarian Action Strategy for Spanish Development Cooperation, developed by The Office of Development Planning and Policy Evaluation (DGPOLDE) in 2007.

### CONCEPT

**Humanitarian Donorship:** It’s the set of activities of prevention, assistance and protection of disaster victims —whether in the case of a natural disaster or a manmade disaster such as war or other armed conflict— and of their direct consequences, designed to alleviate suffering, to ensure survival and to protect human rights. It must be oriented according to the needs and always respecting humanitarian principles.

The purpose of humanitarian assistance is to save lives, alleviate suffering and maintain human dignity.

The Social Promotion Foundation understands Humanitarian Donorship as a broader concept rather than it just being an emergency aid in response to a specific disaster. It’s therefore considered an essential element of humanitarian aid for addressing pre-disaster phases (preparedness, mitigation and prevention) as well as post-disaster ones (rehabilitation in general and reconstruction, reconciliation, etc. in particular). This should lead to development actions.

Humanitarian Donorship, according to the work that is carried out in the Social Promotion Foundation, has therefore four dimensions:

- ① **Preventive dimension.** Including preparation for disaster, mitigation and preventive work in general, as well as considerations about the role of aid in the prevention of conflicts. By its nature, the preventive dimension should also be coordinated with other instruments of development cooperation.
- ② **Disaster response.** Distinguishing emergency response to sudden crisis from emergency response to chronic or long-term crisis, as well as those derived of natural disasters or armed conflicts.
- ③ **Rehabilitation and post-disaster reconstruction.** With its various components of physical, economic, psychological, institutional, etc.
- ④ **Impact and public awareness.** Specifying concrete actions that result in the better protection of victims and in the respect for both international law and humanitarian norms.

## PRINCIPLES OF HUMANITARIAN DONORSHIP

The actions of the Social Promotion Foundation in Humanitarian Donorship shall be in accordance with the principles, concepts and focus agreed upon by the respective international organizations, research experts and the informed experience of the Social Promotion Foundation, which should be consistent with the mission, vision and values of the (Social Promotion Foundation) organization itself:

- ① Respect and promotion of Human Rights and International Humanitarian Law (IHL).
- ② Observance of the remainder of both international and national legal processes within the field.
- ③ The prevention and relief of human suffering through principles of impartiality, neutrality; not discrimination (i.e. fairness / inclusion).
- ④ An aim to provide aid for victims of any type of disaster: natural, human/armed conflicts, with the objective of meeting the victims' requirements, re-establishing their rights and guaranteeing their protection.
- ⑤ The fundamental measure of humanitarian response, as circumstances permit, which considers the periods both prior to and after the disaster, ever maintaining the fight against vulnerability as paramount.
- ⑥ Consistency with other actions carried out by the Social Promotion Foundation Co-operation.
- ⑦ Collaboration and support for local initiatives in their precursory and humanitarian response phases and the encouragement of participation from beneficiaries as from local actors.
- ⑧ Coordination and attempt for greater efficacy within Humanitarian Aid through greater harmonization with other aid-donors and actors.
- ⑨ Respect for the independence, mandates and missions of various (aid) actors.
- ⑩ Quality improvement within the Humanitarian Aid compliant with international standards and a commitment to aid that draws from lessons learnt and that is both responsible and accountable.

**The Strategy of the Social Promotion Foundation underlines** the commitments contained in **the Principles of Good Humanitarian Donorship**, which is an international initiative that brings the document. The first three are:

1. The objectives of humanitarian action are to save lives, alleviate suffering and maintain human dignity during and in the aftermath of man-made crises and natural disasters, as well as to prevent and strengthen preparedness for the occurrence of such situations.

2. Humanitarian action should be guided by the humanitarian principles of humanity, meaning the centrality of saving human lives and alleviating suffering wherever it is found; impartiality, meaning the implementation of actions solely on the basis of need, without discrimination between or within affected populations; neutrality, meaning that humanitarian action must not favour any side in an armed conflict or other dispute where such action is carried out; and independence, meaning the autonomy of humanitarian objectives from the political, economic, military or other objectives that any actor may hold with regard to areas where humanitarian action is being implemented.

3. Humanitarian action includes the protection of civilians and those no longer taking part in hostilities, and the provision of food, water and sanitation, shelter, health services and other items of assistance, undertaken for the benefit of affected people and to facilitate the return to normal lives and livelihoods.

Furthermore, the Social Promotion Foundation has signed the **Code of Conduct in Disaster Relief for the International Red Cross and Red Crescent Movement and NGOs**. The principles of said code are the following (See annex for full version):

Principles of Conduct for the International Red Cross and Red Crescent Movement & NGOs in Disaster Response Programs.

1. The Humanitarian imperative comes first.
2. Aid is given regardless of the race, creed or nationality of the recipients and without adverse distinction of any kind. Aid priorities are calculated on the basis of need alone.
3. Aid will not be used to further a particular political or religious standpoint.
4. We shall endeavour not to act as instruments of government foreign policy.
5. We shall respect culture and custom.
6. We shall attempt to build disaster response on local capacities.
7. Ways shall be found to involve program beneficiaries in the management of relief aid.
8. Relief aid must strive to reduce future vulnerabilities to disaster as well as meeting basic needs.
9. We hold ourselves accountable to both those we seek to assist and those from whom we accept resources.
10. In our information, publicity and advertising activities, we shall recognize disaster victims as dignified humans, not hopeless objects.

An essential aspect of Humanitarian Aid is the speed of aid delivery. In order to enhance **rapid response capacity**, the Social Promotion Foundation highlights the importance of local capacity. Therefore, humanitarian action of the Social Promotion Foundation will seek the participation of local communities in various stages of aid. Special attention will be paid to the processes of post-war rehabilitation and construction of peace promotion drives fostering the coordinated use of various aid tools.

**Disaster prevention, preparation for disaster and risk management** should be an integral part of strategies to fight poverty and integrate development programs. The Social Promotion Foundation will ensure that they are incorporated into their objectives and development strategies.

Finally, given the cultural and religious diversity of the countries where the Social Promotion Foundation carries out most of its activity in Humanitarian Aid, it's noteworthy to highlight that:

- ① Humanitarian Aid should be respectful with cultural habits, customs, and traditions, within a framework of respect for human rights and a Universalist conception of them.

- ② The universality of Humanitarian Aid should be compatible with, and adapted to, different cultural contexts.
- ③ Humanitarian Aid should pay special attention to the rights of those most vulnerable, who see their rights affected in disasters.

## INTERVENTION CRITERIA

With regard to the humanitarian response, it is essential to have some guidelines that direct and clarify the decision making. These guidelines allow for rapid decision making: when and where to intervene as well as where not to intervene, when the action should be finished and what should happen next.

The **basic criteria for the intervention** of the Social Promotion Foundation in issues related to Humanitarian Aid are:

- ① **Severity of the crisis.** With clear data obtained from analysis that allows the valuation of necessities.
- ② **Local response capacity.** Just as much from the authorities as from the civil organizations that are involved. The possibility of supporting the action of the Social Promotion Foundation over the local capacity, governmental and non-governmental is fundamental.
- ③ **Real possibilities for action.** Based on previous experience, means, and presence in the zone.
- ④ **Added value.** Regarding other actors, other donors with which actions could be coordinated.

Other criteria are complementary:

- ① **Geography.** Disasters that take place in priority countries, or in those with previous experience of one or with a long-term commitment to the cooperation of the Social Promotion Foundation.

This would facilitate a connection with development and, in general, a more integrated approach to action.

- ② **Role of other donors in the affected area.** Coordination is fundamental in the humanitarian response to a crisis. The presence of additional donors, especially the UN, is possible comparative advantages, the experience in the zone, etc guides the decision. The presence or coincidence of Peacekeeping Operations or military Operations of another type in the zone should be factors that are considered due to the possibility of positive synergy, as well as, the possibility of problems derived from the lack of coordination, direction, etc. In this sense, it is fundamental to strengthen those exchange mechanisms of information and coordination with other donors and actors in the zone.
- ③ **Humanitarian Space.** As a corollary of many of the given criteria, the existence of a humanitarian space appears fundamental: A humanitarian space where the impartial and independent organizations can work freely, securely, and respecting humanitarian principles and values, having access to victims without constraints. This dimension is particularly relevant in complex disasters or armed conflicts.

## GEOGRAPHICAL CONTEXT

Consistent with the principles, objectives and guidelines of this Strategy and the guidance of aid according to need and the severity of the crisis, **geographical considerations and criteria should not be the priority when deciding the allocation of humanitarian aid resources.** Even so, it should be considered as additional criteria to guide decision making.

In this line and as mentioned in the previous section, the Social Promotion Foundation will have as intervention criteria to be valued in Humanitarian Aid, previous experience or a long-term commitment to cooperation. In this sense, the following countries are of paramount importance for humanitarian aid in the Social Promotion Foundation:

**Middle East:**

Lebanon, Syria, Jordan, Palestinian Territories and Egypt.

**South America:**

Peru, Colombia, Bolivia, Paraguay, Nicaragua, Guatemala, Honduras, El Salvador, Dominican Republic and Haiti.

**Sub-Saharan Africa:**

D.R. Congo, Ethiopia, Kenya, Mozambique, Angola, Ivory Coast, R. South Africa.

**Northern Africa:**

Morocco, Mauritania and Tunisia.

**South-eastern Asia:**

Vietnam, Cambodia, Philippines and Indonesia.

In any case, the joint performances in the medium and long term will not be a prerequisite for the Humanitarian Aid of the Social Promotion Foundation in contexts where the provision of assistance and protection is urgent and responsible for the lives and dignity of victims.

**SECTORIAL FRAMEWORK****I. Education:**

- ① Conception of education as a basic right which should also be considered in emergency and crisis situations.
- ② Incorporation of educational components in the actions in refugee camps and in programs with displaced populations. Special and differentiated attention to the educational needs of children at risk.
- ③ Attention to the educational needs of particularly vulnerable populations such as child soldiers, demobilized people, female victims of violence and other groups.
- ④ Support for the inclusion of content related to risk management and disaster preparedness in school curriculum.

**II. Promoting peace:**

- ① Through the development of peace building efforts with a focus on cooperation strategies in countries or zones of conflict and post-conflict while attending to the cultural and structural factors that pertain to the same goal.

- ② Through the strengthening of civil organizations that stimulate actions and promote values of peace. The formation and promotion of Human Rights and values of Democracy.
- ③ Through the development of initiatives oriented towards education for peace in all countries where this work is being done, especially in countries where conflicts are ongoing.
- ④ Through the strengthening of the Centre for Middle Eastern Studies (CEMO) as a mean for stimulating a better knowledge of the region through dialogue, reflection, an exchange of opinions and research with the participation of international experts in the region.
- ⑤ By means of participation from the Social Promotion Foundation together with members of READI in international forums implicated in this direction (NNUU, European Union).

### III. Psychosocial care:

Attention to those with post-traumatic stress disorder (PTSD), which is the combination of physical and psychological symptoms that the victims and witnesses of brief traumatic or prolonged traumatic events (natural disasters, wars, severe accidents, violent deaths, etc) experience, that emerges as a late response or deferment of stressful events and could persist for long periods of times after the incident.

Psychosocial help and social mental healthcare specialize, overall, in strengthening and restoring a new social equilibrium and the rehabilitation of individuals. These two emphases are important, not only for the health and well being of the individuals of the community, but to make social rehabilitation, economics, and politics of countries possible.

### IV. Food security

The clear connection between the preventative dimension in the humanitarian aid and the food security makes it necessary to encourage initiatives aimed at developing strategies to reduce national and/or regional risks.

The Social Promotion Foundation subscribes to the principles outlined in the World Summit on Food Security in Rome in 2009. The principles approved at the London Convention on Food Aid (1999) will also be taken into account.

### V. Water and sanitation (wash)

Improving management of water resources and to facilitate the access to drinking water and basic sanitation for those with little or no service, with sustainability requirements.

The participation of both men and women is sought in the discussions, decision making and political execution of policies and operations related to sanitation and sustainable water management.

### VI. Housing and living

Understanding the basic habitability as the set of basic physical infrastructure, such as, housing, water, public infrastructure, education services and health, etc. that satisfies the residential needs of the people.

## 2) MANAGEMENT STRUCTURE IN THE SOCIAL PROMOTION FOUNDATION

### Team building in headquarters and local offices

Humanitarian Aid will be coordinated from a specific department in the Social Promotion Foundation.

The department will be coordinated by a technician with previous experience in the management of Humanitarian Aid projects, preferably with a headquarters in one of the action areas. It will count upon the direct support of a technician at the Social Promotion Foundation headquarters in Madrid.

From each of the offices of the Social Promotion Foundation in the different regions, the teams of the Social Promotion Foundation will coordinate with the Humanitarian Aid Department to face the different crises that could arise in their action areas. They will also be responsible for defining the different activities related to risk prevention and to reconstruction actions.

Coordinated systems of information, identification and analysis of necessities will be established. These will facilitate decision making and the elaboration and implementation of actions.

### Elaboration of protocols

It's necessary to define procedures that help speed up the decision making process and the role that each of the actors involved in the Social Promotion Foundation should play in order to carry out humanitarian donorship in an agile, efficient and coherent way.

Some of the procedures include:

- ① Information systems, coordination of the information, access, etc.
- ② Mechanisms of identification and analysis of necessities. The possibility of having one's own equipment, in the case that the situation calls for it, with capacity of displacement, initial evaluation of damage and analysis of needs.
- ③ The decision making process: "Input" and "output strategies" criteria.
- ④ Distribution of functions between diverse entities in the different phases of the action.
- ⑤ Search criteria and resource allocation.
- ⑥ Communication strategy.
- ⑦ Information, monitoring and evaluation mechanisms.
- ⑧ System of accountability for the donors and actors involved (beneficiaries).
- ⑨ Quality control system.
- ⑩ Mechanisms to ensure the active participation of beneficiaries in all phases of the intervention.

### **Explanation of Country Strategy**

The strategies to develop each region with regard to Humanitarian Aid will be included in the regional strategies that are annually made in the Social Promotion Foundation. These strategies should be reflected in the Annual Action Plan of the Social Promotion Foundation, as well as in the successive Strategy Plans which will be designed in the future.

### 3) PRINCIPLES OF GOOD HUMANITARIAN DONORSHIP

#### 23 principles and good practice of Humanitarian Donorship

The 23 Principles and Good Practice defined by the group provide both a framework to guide official humanitarian aid and a mechanism for encouraging greater donor accountability. These were drawn up to enhance the coherence and effectiveness of donor action, as well as their accountability to beneficiaries, implementing organizations and domestic constituencies, with regard to the funding, co-ordination, follow-up and evaluation of such actions.

#### Objectives and Definition of Humanitarian Action

1. The objectives of humanitarian action are to save lives, alleviate suffering and maintain human dignity during and in the aftermath of man-made crises and natural disasters, as well as to prevent and strengthen preparedness for the occurrence of such situations.
2. Humanitarian action should be guided by the humanitarian principles of humanity, meaning the centrality of saving human lives and alleviating suffering wherever it is found; impartiality, meaning the implementation of actions solely on the basis of need, without discrimination between or within affected populations; neutrality, meaning that humanitarian action must not favour any side in an armed conflict or other dispute where such action is carried out; and independence, meaning the autonomy of humanitarian objectives from the political, economic, military or other objectives that any actor may hold with regard to areas where humanitarian action is being implemented.
3. Humanitarian action includes the protection of civilians and those no longer taking part in hostilities, and the provision of food, water and sanitation, shelter, health services and other items of assistance, undertaken for the benefit of affected people and to facilitate the return to normal lives and livelihoods.

#### General Principles

4. Respect and promote the implementation of international humanitarian law, refugee law and human rights.
5. While reaffirming the primary responsibility of states for the victims of humanitarian emergencies within their own borders, strive to ensure flexible and timely funding, on the basis of the collective obligation of striving to meet humanitarian needs.
6. Allocate humanitarian funding in proportion to needs and on the basis of needs assessments.
7. Request implementing humanitarian organizations to ensure, to the greatest possible extent, adequate involvement of beneficiaries in the design, implementation, monitoring and evaluation of humanitarian response.
8. Strengthen the capacity of affected countries and local communities to prevent, prepare for, mitigate and respond to humanitarian crises, with the goal of ensuring that governments and local communities are better able to meet their responsibilities and co-ordinate effectively with humanitarian partners.
9. Provide humanitarian assistance in ways that are supportive of recovery and long-term development, striving to ensure support, where appropriate, to the humanitarian relief to recovery and development activities.

10. Support and promote the central and unique role of the United Nations in providing leadership and co-ordination of international humanitarian action, the special role of the International Committee of the Red Cross, and the vital role of the United Nations, the International Red Cross and Red Crescent Movement and nongovernmental organizations in implementing humanitarian action.

#### **Good Practices in Donor Financing, Management and Accountability Funding**

11. Strive to ensure that funding of humanitarian action in new crises does not adversely affect the meeting of needs in ongoing crises.

12. Recognizing the necessity of dynamic and flexible response to changing needs in humanitarian crises, strive to ensure predictability and flexibility in funding to United Nations agencies, funds and programs and to other key humanitarian organizations.

13. While stressing the importance of transparent and strategic priority-setting and financial planning by implementing organizations, explore the possibility of reducing, or enhancing the flexibility of, earmarking, and of introducing longer-term funding arrangements.

14. Contribute responsibly, and on the basis of burden-sharing, to United Nations Consolidated Inter-Agency Appeals and to International Red Cross and Red Crescent Movement appeals, and actively support the formulation of Common Humanitarian Action Plans (CHAP) as the primary instrument for strategic planning, prioritization and co-ordination in complex emergencies.

#### **Promoting standards and enhancing implementation**

15. Request that implementing humanitarian organizations fully adhere to good practice and are committed to promoting accountability, efficiency and effectiveness in implementing humanitarian action.

16. Promote the use of Inter-Agency Standing Committee guidelines and principles on humanitarian activities, the Guiding Principles on Internal Displacement and the 1994 Code of Conduct for the International Red Cross and Red Crescent Movement and Non-Governmental Organizations (NGOs) in Disaster Relief.

17. Maintain readiness to offer support to the implementation of humanitarian action, including the facilitation of safe humanitarian access.

18. Support mechanisms for contingency planning by humanitarian organizations, including, as appropriate, allocation of funding, to strengthen capacities for response.

19. Affirm the primary position of civilian organizations in implementing humanitarian action, particularly in areas affected by armed conflict. In situations where military capacity and assets are used to support the implementation of humanitarian action, ensure that such use is in conformity with international humanitarian law and humanitarian principles, and recognizes the leading role of humanitarian organizations.

20. Support the implementation of the 1994 Guidelines on the Use of Military and Civil Defence Assets in Disaster Relief and the 2003 Guidelines on the Use of Military and Civil Defence Assets to Support United Nations Humanitarian Activities in Complex Emergencies.

### Learning and accountability

21. Support learning and accountability initiatives for the effective and efficient implementation of humanitarian action.
22. Encourage regular evaluations of international responses to humanitarian crises, including assessments of donor performance.
23. Ensure a high degree of accuracy, timeliness, and transparency in donor reporting on official humanitarian assistance spending, and encourage the development of standardized formats for such reporting.

## 4) ETHIC CODE

### What is a Code of Conduct?

A Code of Conduct *INCLUDES EXPECTATIONS AND DEFINES ACCEPTABLE BEHAVIORS*. It differs from a Code of Ethics in that it contains information pertinent to the individual and their behavior on the job, but may contain detailed offshoot information from the NGO's ethics code. Social Promotion Foundation shall require the employee to sign the code of conduct, at which point it becomes a legal agreement between the *employer* and *employee*. A copy is kept in the employee's file for documentation if necessary.

### Purpose

The purpose of this Code of Conduct is *TO DEVELOP AND MAINTAIN A STANDARD OF CONDUCT THAT IS ACCEPTABLE TO Social Promotion Foundation*, its Staff, beneficiaries, Donors, contractors and subcontractors, legal partners and all the stakeholders. The conduct code includes behavior guidelines that are consistent with Organization policies and reflect how Social Promotion Foundation perceives its image. It also serves to remind the Social Promotion Foundation employee of what is expected of them, and that their actions, appearance, conduct and demeanor will affect Social Promotion Foundation and their career.

### Legal Tool

Since signed Social Promotion Foundation employee Code of Conduct can be considered A LEGAL DOCUMENT, they can be used as a disciplinary or legal action tool for employee infractions. It is recommended that a qualified human resources professional or employment lawyer view the document before implementation to ensure that it does not violate any national or international employment laws. When coupled with an employee handbook or code of ethics, the code of conduct must not contradict any other published information to avoid confusion or misunderstandings.

### Blanket Clauses

This Code of Conduct includes general clauses of adherence to Social Promotion Foundation policies and ethics in an effort to keep it simple. Blanket clauses simply state that the employee agrees to follow the rules published elsewhere, ideally in an employee handbook (which should also include a dated signature document). In the handbook, you may go into further detail as to particular rules, regulations and policies.

In this way, Social Promotion Foundation is basing its Code of Conduct and Ethical Guidelines on:

### Principles of Conduct for the International Red Cross and Red Crescent Movement and NGOs in Disaster Response Programs

#### 1. The Humanitarian imperative comes first.

1.1. The right to receive humanitarian assistance, and to offer it, is a fundamental humanitarian principle which should be enjoyed by all citizens of all countries. As members of the international community, we recognize our obligation to provide humanitarian assistance wherever it is needed. Hence the need for unimpeded access to affected populations is of fundamental importance in exercising that responsibility.

1.2. The prime motivation of our response to disaster is to alleviate human suffering amongst those least able to withstand the stress caused by disaster.

1.3. When we give humanitarian aid it is not a partisan or political act and should not be viewed as such.

2. Aid is given regardless of the race, creed or nationality of the recipients and without adverse distinction of any kind. Aid priorities are calculated on the basis of need alone.

2.1. Wherever possible, we will base the provision of relief aid upon a thorough assessment of the needs of the disaster victims and the local capacities already in place to meet those needs.

2.2. Within the entirety of our programs, we will reflect considerations of proportionality.

2.3. Human suffering must be alleviated whenever it is found; life is as precious in one part of a country as another. Thus, our provision of aid will reflect the degree of suffering it seeks to alleviate.

2.4. In implementing this approach, we recognize the crucial role played by women in disaster-prone communities and will ensure that this role is supported, not diminished, by our aid programs. The implementation of such a universal, impartial and independent policy can only be effective if we and our partners have access to the necessary resources to provide for such equitable relief, and have equal access to all disaster victims.

3. Aid will not be used to further a particular political or religious standpoint.

3.1. Humanitarian aid will be given according to the need of individuals, families and communities. Notwithstanding the right of NGHAs to espouse particular political or religious opinions, we affirm that assistance will not be dependent on the adherence of the recipients to those opinions.

3.2. We shall not tie the promise, delivery or distribution of assistance to the embracing or acceptance of a particular political or religious creed.

4. We shall endeavour not to act as instruments of government foreign policy.

4.1. NGHAs are agencies which act independently from governments. We therefore formulate our own policies and implementation strategies and do not seek to implement the policy of any government, except in so far as it coincides with our own independent policy.

4.2. We shall not ever knowingly - or through negligence - allow ourselves, or our employees, to be used to gather information of a political, military or economically sensitive nature for governments or other bodies that may serve purposes other than those which are strictly humanitarian, nor will we act as instruments of foreign policy of donor governments.

4.3. We shall use the assistance we receive to respond to needs and this assistance should not be driven by the need to dispose of donor commodity surpluses, or by the political interest of any particular donor.

4.4. We value and promote the voluntary giving of labour and finances by concerned individuals to support our work and recognize the independence of action promoted by such voluntary motivation. In order to protect our independence we will seek to avoid dependence upon a single funding source.

5. We shall respect culture and custom.

5.1. We shall endeavour to respect the culture, structures and customs of the communities and countries we are working in.

## 6. We shall attempt to build disaster response on local capacities.

6.1. All people and communities - even in disaster - possess capacities as well as vulnerabilities. Where possible, we shall strengthen these capacities by employing local staff, purchasing local materials and trading with local companies. Where possible, we will work through local NGHAs as partners in planning and implementation, and cooperate with local government structures where appropriate.

6.2. We shall place a high priority on the proper co-ordination of our emergency responses.

6.3. This is best done within the countries concerned by those most directly involved in the relief operations, and should include representatives of the relevant UN bodies.

## 7. Ways shall be found to involve program beneficiaries in the management of relief aid.

7.1. Disaster response assistance should never be imposed upon the beneficiaries. Effective relief and lasting rehabilitation can best be achieved where the intended beneficiaries are involved in the design, management and implementation of the assistance program.

7.2. We shall strive to achieve full community participation in our relief and rehabilitation programs.

## 8. Relief aid must strive to reduce future vulnerabilities to disaster as well as meeting basic needs.

8.1. All relief actions affect the prospects for long term development, either in a positive or a negative fashion. Recognizing this, we shall strive to implement relief programs which actively reduce the beneficiaries' vulnerability to future disasters and help create sustainable lifestyles.

8.2. We shall pay particular attention to environmental concerns in the design and management of relief programs.

8.3. We shall also endeavour to minimize the negative impact of humanitarian assistance, seeking to avoid long-term beneficiary dependence upon external aid.

## 9. We hold ourselves accountable to both those we seek to assist and those from whom we accept resources.

9.1. We often act as an institutional link in the partnership between those who wish to assist and those who need assistance during disasters. We therefore hold ourselves accountable to both constituencies.

9.2. All our dealings with donors and beneficiaries shall reflect an attitude of openness and transparency. We recognize the need to report on our activities, both from a financial perspective and the perspective of effectiveness. We recognize the obligation to ensure appropriate monitoring of aid distributions and to carry out regular assessments of the impact of disaster assistance.

9.3. We shall also seek to report, in an open fashion, upon the impact of our work, and the factors limiting or enhancing that impact. Our programs will be based upon high standards of professionalism and expertise in order to minimize the wasting of valuable resources.

10. In our information, publicity and advertising activities, we shall recognize disaster victims as dignified humans, not hopeless objects.

10.1. Respect for the disaster victim as an equal partner in action should never be lost. In our public information we shall portray an objective image of the disaster situation where the capacities and aspirations of disaster victims are highlighted, and not just their vulnerabilities and fears.

10.2. While we shall cooperate with the media in order to enhance public response, we will not allow external or internal demands for publicity to take precedence over the principle of maximizing overall relief assistance.

10.3. We shall avoid competing with other disaster response agencies for media coverage in situations where such coverage may be to the detriment of the service provided to the beneficiaries or to the security of our staff or the beneficiaries.

On such base, Social Promotion Foundation considers that our capacity to ensure the protection of and assistance to refugees, IDPs and other persons of concern (hereafter “*persons of concern*”) depends on the ability of its staff to uphold and promote the highest standards of ethical and professional conduct.

Further, it is recognized that Social Promotion Foundation’s work often puts its staff in positions of unequal power relations towards its persons of concern.

This Code of Conduct holds the values and rules that Social Promotion Foundation and its staff shall act by to uphold and safe-guard the necessary standards of conduct and to avoid misconduct.

In conclusion, Social Promotion Foundation has a “*Zero Tolerance Approach*” to all forms of fraud, bribery, and corruption, creating the following CODE OF CONDUCT AND ETHICAL GUIDELINES:

This Code of Conduct applies to Social Promotion Foundation and to its entire staff in relation to international program activities. International (HQ and on the field) and National personnel in the international programs are obliged by this Code of Conduct. Social Promotion Foundation Staff, wherever it is located on (HQ or on the field) must assume as own duties such Ethical Guidelines, as HUMANITARIAN WORKER, prioritizing the **4 Humanitarian Principles**:

#### **HUMANITY.**

To prevent and alleviate suffering wherever it may be found. To protect life and health and to ensure respect for the human being.

#### **IMPARTIALITY.**

To carry out humanitarian action without discrimination, to relieve suffering, giving priority to the most urgent cases of distress.

#### **INDEPENDENCE.**

To remain independent from political, economic, military or other non-humanitarian objectives.

#### **NEUTRALITY.**

To abstain from taking sides in hostilities. To refrain from engagement in political, religious, racial or ideological debates and controversies.

Social Promotion Foundation and its staff are covered by other sets of rules in relation to national activities in Spain. However, these sets of rules promote the same core values and obligations.

Managers at all levels have a particular responsibility to uphold these standards, to set a good example, and to create a working environment that supports and empowers staff.

### STATUS OF THIS CODE OF CONDUCT

- 1 This Code of Conduct is not only a moral code that serves as an illustrative guide for Social Promotion Foundation and its staff to make ethical decisions in their professional lives, and at times in their private lives. It is also an integral part of their conditions of employment. This Code of Conduct is therefore an appendix to their individual employment contract.
- 2 All Social Promotion Foundation staff is responsible for encouraging, advocating and promoting the dissemination of the Code of Conduct. They also have a role in implementing, monitoring and enforcing its standard.
- 3 Staff is also urged to encourage partners to adhere to these standards and to join Social Promotion Foundation staff in upholding them. Managers at all levels have a special responsibility to support and develop systems that maintain this environment.
- 4 All Social Promotion Foundation staff is obliged to report to managers or to HQ concerns or suspicions regarding criminal or ethical activities that are in conflict with this Code of Conduct and which may compromise Social Promotion Foundation.

### IMPLEMENTATION AND INTERPRETATION

While acknowledging that local laws and customs may differ from one country to another, the Code of Conduct is based on international legal standards. Guidance on appropriate interpretation can be found in the Notes to the UNHCR Code of Conduct, in the UN Secretary-Generals Bulletin on Special measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13), and in the IASC Report on protection from sexual exploitation and abuse in humanitarian crises (13 June 2002).

All Social Promotion Foundation staff members shall contact their manager or HQ for guidance if they find themselves in a situation of doubt in relation to this Code of conduct and its provisions.

### CORE VALUES AND GUIDING PRINCIPLES

Social Promotion Foundation and its staff are committed to the following fundamental values and principles:

- 1 The values enshrined in the Charter of the United Nations: respect for fundamental human rights, social justice and human dignity, and respect for the equal rights of men and women.

Social Promotion Foundation and its staff shall actively promote adherence to the principles of international refugee law, international human rights law and international humanitarian law.

- 2 It is Social Promotion Foundation' and its staff primary commitment to ensure the protection of and assistance to its persons of concern, in accordance with Social Promotion Foundation' mandate. Social Promotion Foundation and its staff are committed to supporting the fullest possible participation of persons of concern –as individuals, families and communities– in decisions that affect their lives.

- ③ Social Promotion Foundation and its staff will respect the dignity and worth of every individual, will promote and practice understanding, respect, compassion and tolerance, and will demonstrate discretion and maintain confidentiality as required. Social Promotion Foundation and its staff will aim to build constructive and respectful working relations with humanitarian partners, will continuously seek to improve performance, and will foster a climate that encourages learning, supports positive change, and applies the lessons learned from experience.
- ④ Social Promotion Foundation and its staff will show respect for all persons equally without distinction whatsoever of race, gender, religion, colour, national or ethnic origin, language, marital status, sexual orientation, age, socio-economic status, disability, political conviction, or any other distinguishing feature. Social Promotion Foundation and its staff will strive to remove all barriers to equality.
- ⑤ Social Promotion Foundation and its staff will respect cultures, customs and traditions of all peoples, and will strive to avoid behaving in ways that are not acceptable in a particular cultural context. However, when the tradition or practice is considered to be directly contrary to an international human rights instrument or standard, Social Promotion Foundation and its staff will be guided by the applicable human rights instrument or standard.
- ⑥ Social Promotion Foundation and its staff will not tolerate any form of sexual exploitation or abuse and are aware that misconduct is ground for disciplinary measures including summary dismissal.

#### **ILLEGAL ACTIVITY**

Each Social Promotion Foundation personnel represent and warrant that neither it nor any of its subcontractors are engaged in any sort of illegal activities.

#### **ANTI CORRUPTION**

Each Social Promotion Foundation personnel represent and warrant that neither it nor any of its subcontractors are engaged in any sort of corruption, defined by Transparency International as the misuse of entrusted power for private gain, including but not limited to money laundering, bribery, facilitation payments, embezzlement, extortion, favouritism, fraud and obstruction of justice.

#### **TERRORISM**

- ① Each Social Promotion Foundation personnel represent and warrant that neither it nor any of its subcontractors are engaged in any transactions with, and/or the provisions of resources and support to, individuals and organizations associated with terrorism.
- ② Each Social Promotion Foundation personnel represent and warrant that neither it nor any of its subcontractors are engaged in any transactions with, and/or the provision of resources and support to, individuals and organizations associated with, receiving any type of training for, or engaged in, any act or offense described in Article 2, Sections 1,3,4 and 5 of the International Convention for the Suppression of the Financing of Terrorism, adopted by the General Assembly of the United Nations in Resolution 54/109 of 9 December 1999.

#### **ENVIRONMENT**

- ① Each Social Promotion Foundation personnel represent and warrant that neither it nor any of its subcontractors are violating any international environmental agreements.

② Each Social Promotion Foundation personnel undertake to support a precautionary approach to environmental challenges and not in any way damaging, destroying or causing any harm to the environment. Further the each Social Promotion Foundation personnel undertake to encourage the development and diffusion of environmentally friendly technologies and undertake initiatives to promote environmental responsibility and sustainability.

## **MINES AND WEAPONS**

① Each Social Promotion Foundation personnel represent and warrant that neither it nor any of its subcontractors are actively and directly or indirectly engaged in patent activities, development, assembly, production, trade or manufacture of mines/Improvised Explosive Devices (IED) or in such activities in respect of components primarily utilized in the manufacture of mines. The term “*Mines*” means those devices defined in Article 2, Sections 1, 4 and 5 of Protocol II annexed to the Convention on Prohibitions and Restrictions on the Use of Certain Conventional Weapons Which May Be Deemed to Be Excessively Injurious or to Have Indiscriminate Effects of 1980.20.2.

② Each Social Promotion Foundation personnel represent and warrant that neither it nor any of its subcontractors are actively and directly engaged in patent activities, development, assembly, production, stockpiling, trade or manufacture of weapons including but not limited to firearms, chemical weapons, biological weapons and nuclear weapons.

## **SEXUAL EXPLOITATION AND SEXUAL ABUSE**

Each Social Promotion Foundation personnel represent and warrant that it and all of its subcontractors are protecting all people from sexual abuse and sexual exploitation, meaning any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. Similarly, the term “*sexual abuse*” means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

## **CHILD LABOUR**

Each Social Promotion Foundation personnel represent and warrant that neither it, nor any of its subcontractors are engaged in any practice inconsistent with the rights set forth in the Convention on the Rights of the Child, including Article 32 thereof, which, inter alia, requires that a child shall be protected from performing any work that is likely to be hazardous or interfere with the child’s education, or to be harmful to the child’s health or physical, mental, spiritual, moral or social development.

## **FORCED LABOUR**

Each Social Promotion Foundation personnel represent and warrant that neither it nor any of its subcontractors are using any form of forced and compulsory labour.

## **WORKING CONDITIONS**

① Each Social Promotion Foundation personnel represent and warrant that neither it nor any of its subcontractors are allowing working conditions that violate the Convention on Occupational Safety and Health from 1981 including the Protocol from 2002, the Convention on Minimum Wage Fixing from 1970 and the Conventions on Hours of Work of the International Labour Organization (ILO).

② Each Social Promotion Foundation personnel represent and warrant that it and all of its subcontractors are protecting workers from any acts of physical, verbal, sexual or psychological harassment abuse or threats in the workplace by either their fellow workers or their managers.

#### DISCRIMINATION IN WORKING CONDITIONS

① Each Social Promotion Foundation personnel represent and warrant that neither it nor any of its subcontractors are discriminating any of its workers with regard to race, colour, gender, language, political or other opinion, caste, national or social origin, property, birth, union affiliation, sexual orientation, health status, age, disability, or other distinguishing characteristics.

② Each Social Promotion Foundation personnel represent and warrant that neither it nor any of its subcontractors are making employment-related decisions, from hiring to termination and retirement which are not based only on relevant and objective criteria.

#### TRANSPARENCY AND ACCOUNTABILITY

① Each Social Promotion Foundation personnel undertake a duty of full disclosure of any relevant material at any time and at the sole discretion of Social Promotion Foundation in order for Social Promotion Foundation to examine any alleged breach of this Code of Ethics.

② Any Breach of the representations and warranties of this Code of Ethics shall entitle the Social Promotion Foundation to terminate any contractual relations with the Humanitarian Worker/HQ Staff immediately upon notice to the Contract Party, at no cost to the Social Promotion Foundation.

#### SAFETY AND SECURITY

① Based on the “*DUTY OF CARE*” duty, Social Promotion Foundation has elaborated its own SECPRO Protocols for the Expatriates. It remarks Rights and duties towards Social Promotion Foundation for each Social Promotion Foundation Expatriate while is under Social Promotion Foundation Contract, bearing in mind that everybody is the first responsible of its own security.

② All the Social Promotion Foundation Staff will be trained in SECPRO Procedures.

③ Security Officer is fulltime available in order to solve any SECPRO issue immediately.

④ Any kind of SECPRO SOP violation will be prosecuted according the importance of such violation.

#### DRUGS AND ALCOHOL

① Drugs are strictly forbidden.

② The alcohol consumption is forbidden during work schedule.

According the “*Duty of Care*”, the issue of the adverse effects of alcohol consumption is covered under the *Occupational Health and Safety (OHS) Act 2014*. The Act requires:

A) Social Promotion Foundation to provide and maintain a working environment that is safe and without risks to health (Section 21). Without in any way limiting the generality of this duty, the Organization has duties with respect to plant, substances and systems of work; providing facilities for and information, instruction training and supervision to their employees; monitoring their health and safety and so on (Sections 21(2) and 22).

B) Social Promotion Foundation personnel to ensure that persons other than employees (which would include the public/beneficiaries) are not exposed to risks to their health or safety arising from the undertaking of Social Promotion Foundation-HQ (Sections 23 and 24); and

C) Social Promotion Foundation personnel to take reasonable care for their own health and safety and that of others (for example, ensuring they are not, by use of alcohol, affected in a way that may put themselves or others at risk); and to co-operate with Social Promotion Foundation-HQ in their efforts to comply with OHS requirements (Section 25).

## CONFIDENTIAL INFORMATION

Sensitive information about Social Promotion Foundation, Beneficiaries and/or Donors, Projects, Records and dossiers, Budgets, Target Areas, Hot details, internal incidents, etc. is considered “*Confidential Information*”, according to Social Promotion Foundation Rules, none can discuss such information with unconnected, unaffiliated or external people.

## IMAGES, LOGOS, ACRONYMS AND OTHER INTELLECTUAL PROPERTY

- ① Each Social Promotion Foundation member is 24 x 7 image of the Organization, acting according to such precept.
- ② Social Promotion Foundation shall protect its own intellectual property respecting the IP rights of other actors involved in the interventions/project, including copyright for any kind of audiovisual material (DVD, videos, photos, etc.), licenses and trademarks (it includes the own Social Promotion Foundation acronym and logo).
- ③ The VISIBILITY of both Social Promotion Foundation and the Donor (except explicit refusal of such right) must be shown in each intervention and material/equipment covered for the projects, besides any kind of publicity/informational event (Radio, TV...).

## CONFLICT OF INTEREST

① A *conflict of interest* (COI) is a situation in which a person or organization is involved in multiple interests, financial or otherwise, one of which could possibly corrupt the motivation or decision-making of that individual or organization. The presence of a conflict of interest is independent of the occurrence of impropriety. Therefore, a conflict of interest can be discovered and voluntarily defused before any corruption occurs. A conflict of interest exists if the circumstances are reasonably believed (on the basis of past experience and objective evidence) to create a risk that a decision *may* be unduly influenced by other, secondary interests, and not on whether a particular individual *is actually* influenced by a secondary interest.

A widely used definition is: “A *conflict of interest* is a set of circumstances that creates a risk that professional judgment or actions regarding a primary interest will be unduly influenced by a secondary interest.” “*Primary interest*” refers to the principal goals of the profession or activity, such as the protection of beneficiaries, the health of patients, the integrity of research, and the duties of Social Promotion Foundation Missions. “*Secondary interest*” includes personal benefit and is not limited to only financial gain but also such motives as the desire for professional advancement, or the wish to do favours for family and friends. These secondary interests are not treated as wrong in and of themselves, but become objectionable when they are believed to have greater weight than the primary interests.

- ② Social Promotion Foundation shall take all necessary measures to prevent in the procurement procedures any conflict of interest and shall ensure that Social Promotion Foundation members are aware of their duties of disclosure related to this principle.
- ③ The Social Promotion Foundation-Local/HQ/Expatriate Staff relationship is based on THE DUTY OF LOYALTY.
- ④ Social Promotion Foundation agrees that in all matters shall be subject to the provisions of the Spanish Civil Code and the practice and custom in this matter.
- ⑤ Of any dispute arising from the interpretation, performance or breach of contracts, the issue will be submitted to the jurisdiction of the Courts of Madrid.

## 5) STAFF MEMBERS' COMMITMENT

As a Social Promotion Foundation staff member I commit myself to the following:

### **I. To treat all persons of concern fairly, and with respect and dignity.**

I.1. I will always seek to understand the difficult experiences that persons of concern to Social Promotion Foundation have faced and survived, as well as the disadvantaged position in which they – particularly on the basis of gender, age or disability – may find themselves in relation to those who hold power or influence over aspects of their lives.

I.2. I will always seek to care for and protect the rights of children, and act in a manner that ensures that their best interests shall be the paramount consideration.

I.3. If my job involves direct work with persons of concern; I will meet with them regularly, in order to fully understand their experiences and needs, and to explain the role of Social Promotion Foundation and the scope of its work.

I.4. I will keep myself informed about Social Promotion Foundation's policies, objectives and activities and about refugee concerns, and will do my utmost to support the Social Promotion Foundation's protection and assistance work.

### **II. To uphold the integrity of Social Promotion Foundation, by ensuring that my personal and professional conduct is, and is seen to be, of the highest standard.**

II.1. I will demonstrate integrity, truthfulness, dedication and honesty in my actions.

II.2. I will be patient, respectful and courteous to all persons with whom I deal in an official capacity, including persons of concern, representatives of operational and implementing partners, governments and donors.

II.3. I will observe local laws, will meet all my private legal and financial obligations, and will not seek to take personal advantage of any privileges that have been conferred on me in the interest of Social Promotion Foundation.

II.4. I will do my utmost to ensure that the conduct of members of my household does not reflect unfavourably on the integrity of Social Promotion Foundation.

### **III. To perform my official duties and conduct my private affairs in a manner that avoids conflicts of interest, thereby preserving and enhancing public confidence in Social Promotion Foundation.**

III.1. My actions will be free of any consideration of personal gain and I will resist any undue political pressure in decision-making.

III.2. I will neither seek nor accept instructions regarding the performance of my duties from any government, including by national authorities, or from any authority external to Social Promotion Foundation.

III.3. I will neither give nor accept any honour, decoration, favour gift, remuneration, or bribe, to / from any government; nor will I give nor accept such to / from any other source external to Social Promotion Foundation without prior authorization. It is, however, allowed to give or accept small tokens of

appreciation that are exchanged in accordance with local practice provided that it cannot compromise the integrity of Social Promotion Foundation.

III.4. I will not engage in any outside occupation or employment without prior authorization.

III.5. I will not accept supplementary payments or subsidies from a government or any other source, or participate in certain political activities such as standing for or holding public office without prior authorization.

III.6. I will avoid assisting private persons or companies in their undertakings with Social Promotion Foundation where this might lead to actual or perceived preferential treatment.

III.7. I will never participate in activities related to procurement of goods or services, or in human resource activities, where a conflict of interests may arise.

#### **IV. To contribute to building a harmonious workplace based on team spirit, mutual respect and understanding.**

IV.1. I will show respect to all colleagues, regardless of status or position, and will allow all colleagues the opportunity to have their views heard, and to contribute from their knowledge and experience to team efforts.

IV.2. I will communicate openly and share relevant information (subject to confidentiality requirements) with other colleagues, and will endeavour to respond in a timely manner to queries.

IV.3. I will respect my colleagues' privacy, and avoid misinformation.

IV.4. I will seek to resolve differences and solve problems when they arise, and will contribute to building constructive dialogue, guided by mutual respect and an open, positive approach, between management and staff representatives.

IV.5. As a manager I will be open to the views of all team members. I will provide timely feedback on the performance of each team member through guidance, motivation and full recognition of their merits.

#### **V. To promote the safety, health and welfare of all Social Promotion Foundation staff as a necessary condition for effective and consistent performance.**

V.1. I will remain aware of and comply with all instructions designed to protect my health, welfare and safety.

V.2. I will always consider the safety of staff in operational decisions.

V.3. If I have doubts regarding an instruction that I consider threatening to my safety or the safety of other persons, I will bring this immediately to the attention of my manager.

V.4. As a manager, I will endeavour to ensure that the health and well-being of staff and their families are not subjected to undue risk. I will promote a healthy work-life balance for staff, and will respect staff entitlements.

**VI. To safeguard and make responsible use of the information and resources to which I have access by reason of my employment with Social Promotion Foundation.**

VI.1. I will exercise due care in all matters of official business, and not divulge any confidential information about persons of concern, colleagues and other work-related matters in accordance with the terms of employment and current guidelines.

VI.2. I will protect, manage and utilize Social Promotion Foundation human, financial and material resources efficiently and effectively, bearing in mind that these resources have been placed at Social Promotion Foundation's disposal for the benefit of the persons of concern.

**VII. To prevent, oppose and combat all exploitation and abuse of persons of concern.**

VII.1. I undertake not to abuse the power and influence that I have by virtue of my position over the lives and well-being of persons of concern.

VII.2. I will never request any service or favour from persons of concern in return for protection or assistance.

VII.3. I will never engage in any exploitative relationships, emotional, financial or employment related with persons of concern. I will act responsibly when hiring or otherwise engaging persons of concern for private services. I will report in writing on the nature and conditions of this employment to my manager.

VII.4. I will not engage in sexual activity with children under the age of 18. Mistaken belief in the age of the child does not constitute a defence.

VII.5. I will not engage in sexual exploitation or abuse of persons of concern and I have a particular duty of care towards women and children.

VII.6. I will neither solicit nor engage in commercial exchange of sexual services as such relationships may undermine the credibility and the image of the Humanitarian Sector and of Social Promotion Foundation.

VII.7. I am aware that Social Promotion Foundation strongly discourages sexual relationships between its staff members and persons of concern, although these relations are not exploitative or abusive. Such relationships may undermine the credibility and the integrity of Social Promotion Foundation and of the staff members involved. Should I find myself in such a relationship with a person of concern that I consider non-exploitative and consensual, I will report this to my manager for appropriate guidance in the knowledge that this matter will be treated with due discretion.

PSEA Protocols are available at HQ and they are disseminated to each Mission and Staff.

**VIII. To refrain from any involvement in criminal or unethical activities, activities that contravene human rights, or activities that compromise the image and interests of Social Promotion Foundation.**

VIII.1. Based on the “DO NOT HARM” duty, I will neither support nor take part in any form of illegal, exploitative or abusive activities, including, for example, child labour, and trafficking of human beings and commodities.

**IX. To refrain from any form of harassment, discrimination, physical or verbal abuse, intimidation or favouritism in the workplace.**

IX.1. I will not engage in or tolerate any form of harassment in the workplace, including sexual harassment and abuse of power.

IX.2. As a manager, I will not solicit favours, loans or gifts from staff, nor will I accept unsolicited ones that are of more than token value.

IX.3. I recognize that there is an inherent conflict of interest and potential abuse of power in having intimate and sexual relations with staff under my supervision. I am aware that Social Promotion Foundation strongly discourages such relations. Should I find myself in such a relationship, I will resolve this conflict of interest without delay.

## 6) REPORTING (COMPLIANCE)

Anyone who suspects that Social Promotion Foundation, or any its National/International employees, directors, officers, consultants, suppliers, or other business partners, is not respecting or upholding any part the Social Promotion Foundation standards in its Code of Ethics & Code of Conduct is encouraged to report the matter directly to: [compliance@promocionsocial.org](mailto:compliance@promocionsocial.org)

Such information will be used in an anonymous way, until the verification of the incident in order to study the civil and penal procedures against the guilty.

Under the Spanish Law, the International Humanitarian Law and the Spanish Agency for International Cooperation and Development (AECID) Normative, Social Promotion Foundation is responsible for monitoring, investigating, enforcing and reporting on compliance.

A Model Enquiry is developed and made available to the parties in order to facilitate their reliance on the mechanism.