



GLOBAL GREENGRANTS FUND

Values and Conduct Charter

2024

Table of Contents	
Section	Page Number
Section 1: Introduction	3
Why a Values and Conduct Charter?	3
Aims & Objectives	4
Who does this policy apply to?	5
Who is responsible for implementing this policy?	6
Section 2: Policy Framework	7
Key Definitions <ul style="list-style-type: none"> • Definitions of Violence • Definitions of Discrimination, Bullying, Intimidation and Exploitation • Definitions of Fraud, Bribery, Corruption 	7-11
Guiding Principles	11
Values and Conduct Charter	11
Statutory and Legal Framework	14
Section 3: Redressal Mechanisms	14
Reporting	14
Informal Processes (Mediation)	16
Formal Processes (Investigation)	16
Confidentiality and Protection	17
Digital Security and Safety	17

Table of Contents	
Section	Page Number
Section 4: Accountability	19
Commitments	19

This document will be reviewed on a maximum interval of once every three years by the Safeguarding Committee. Revisions will be adopted into a new version, with the 'last reviewed date' marked below.

*Please Note: This policy contains explicit definitions of forms of abuse (pages 7 to 11).

Section 1: Introduction

1. Established in 1993, Global Greengrants Fund (Global Greengrants) mobilizes resources for communities worldwide to protect our shared planet and work towards creating a more equitable world. Global Greengrants is both a non-profit organization in the US, and a charity in England and Wales (Global Greengrants UK). This Values and Conduct Charter covers both entities of Global Greengrants, which for the purposes of this Values and Conduct Charter will henceforth be described as Global Greengrants. Together, these organizations make small grants to grassroots groups working to address environmental injustices, help people protect the environment, live sustainably, preserve biodiversity and amplify their voices to affirm their rights^[1]. Global Greengrants is committed to achieving global environmental justice that is rooted in cultural integrity and led by communities and grassroots movements. This commitment is centered in working collectively to create an enabling, equitable, and safe work environment for all stakeholders in the Global Greengrants network to thrive.

2. Global Greengrants believes that the health, welfare and safety of all adults and children is paramount, and that all people, without exception, have a human right to be protected from harm and abuse of any kind regardless of age, gender, gender identity, gender expression, ethnicity, race, color, national identity, national origin, ability, sexuality, sexual orientation, lifestyle, family make-up, marital status, pregnancy or parental status, medical condition, genetic information, religion, or beliefs^[2].

Why a Values and Conduct Charter?

3. Global Greengrants is committed to advancing environmental and social justice, and does this through its global network of activists and donors that support communities to protect their ways of life and our planet. Key to affirming these human rights is ensuring that persons working for Global Greengrants and as part its global network feel safe and secure. We recognize that power

structures, advantages, and barriers exist for people, and that we all do not start from the same place.

4. To center the voices of those who belong to traditionally excluded groups and practice these values across all processes, programs, and partnerships, Global Greengrants relies on the voices, expertise, and first-hand knowledge of communities on the ground (referred in this policy as **'grantees'** and **'partners'**). These connections are catalyzed by a trusted network of experts (referred to as **'advisors'**) that work with Global Greengrants and are the main liaison points for the grantees, partners, staff, and coordinators.

5. We recognize that, while there is much that unites us, we are different because of our range of identities and experiences. Some of these differences include, but are not limited to, ability and disability, age, socioeconomic status, culture, ethnicity, gender, nationality, race, caste, religion, and sexual orientation. Understanding, valuing, and effectively managing these differences can result in deep and meaningful participation and greater trust.

Aims & Objectives

(i) Through this Values and Conduct Charter, Global Greengrants is committed to establishing safe spaces that recognize, educate, and build the internal skills and capacities of stakeholders to ensure a safe culture and working environment for all those who are a part of this work.

(ii) Global Greengrants is committed to developing and strengthening an enabling environment and a culture of communication, trust, and empathy, where the health, safety, and dignity of all persons associated with Global Greengrants, directly or indirectly, is given primacy.

(iii) Global Greengrants recognizes and respects the diverse contexts and ways in which grantees engage in activism, organizing and mobilizing communities to advance social and environmental justice. As part of protecting and advancing the same, it is committed to a consistent network-wide, zero tolerance approach to forms of stigma, discrimination, and violence.

(iv) It is to achieve this purpose that Global Greengrants is introducing a Values and Conduct Charter, which aims to enable individuals engaged with Global Greengrants to uphold and safeguard the dignity, freedom, and liberty of all people.

(v) To provide a fair and equitable working environment to staff, board of director members, coordinators, administrators, grantmaking advisors, consultants, volunteers, and interns, in particular ensuring prohibition of abuse of fiduciary relationships.

(vi) It is committed to the prevention, deterrence, and detection of fraud, bribery, and any form of corruption and illegal practices in the conduct of its work.

- (vii) In the event of any safeguarding concerns, to provide measures to ensure that appropriate and effective action is taken, including guidelines for reporting and investigation.

It is intended that this policy and subsequent procedures outlined within it, and those that develop relating to the same, will be widely promoted and are mandatory for all members of the Global Greengrants network. The Values and Conduct Charter is an iterative policy. Its practices are to be strengthened based on learnings from having implemented the same and feedback received.

Who does this policy apply to?

7. Global Greengrants' global network includes registered entities in Colorado, USA and England and Wales, UK. In addition to our staff, Global Greengrants currently has 27 advisory boards and over 200 volunteer grantmaking advisors located in Africa, Asia, Latin America, Middle East, North America, Europe, and the Pacific Islands. The Values and Conduct Charter applies to all existing and new members of Global Greengrants' network, including staff, board of director members, coordinators, administrators, grantmaking advisors, grantees, independent funds, and global partners. In all instances:

- (i) All individuals working with Global Greengrants, or representing it in any capacity, regardless of the nature of their contract, duration of employment (internship or volunteer tenure), or position in the network/organization.
- (ii) All external professionals, consultants, partner organizations, guests, interns, volunteers, donors with donor-advised or pooled funds, visitors working with the network, and/or those who have received funding from Global Greengrants.
- (iii) Teams conducting site visits, donors, or individuals representing Global Greengrants interacting with grantee partners, through any activities directly or indirectly related to those belonging to any grantee partners.
- (iv) As part of Global Greengrants' fiduciary commitments, this policy applies to grantees, in as much as they are required to not use Global Greengrants funds in any way that violates Global Greengrants' Values and Conduct Charter. If found or reported to be in violation of the same, Global Greengrants may initiate an internal assessment/report and take action based on the findings. Global Greengrants is not responsible for the individual actions of grantee partners, and is committed to reducing the impact of/preventing harm.
- (v) While Global Greengrants does not directly work with children, this policy recognizes and includes them in circumstances where any form of interaction/engagement may occur. In the case of children, their rights within this policy and how it applies to them must be explained at the outset of any engagement, with permission sought from their legal guardians and informed consent provided by persons directly, that the same has been understood and will be adhered to. In the case of working with individuals in contexts where they cannot provide consent of their own volition, the permission of legal guardians must be sought prior to the same.

Who is responsible for implementing this policy?

8. Global Greengrants' President and CEO and Global Greengrants UK's Executive Director are responsible for implementing the Values and Conduct Charter policy. Their responsibilities include, but are not limited to, providing resources for its operationalization, training and orientation for staff and network members, and ensuring redressal mechanisms are working effectively. In addition, each individual who is a part of Global Greengrants' network is proactively responsible for understanding, upholding, and implementing the Values and Conduct Charter. Global Greengrants' institutional responsibilities in ensuring all staff and network members understand and adhere to the Values and Conduct Charter are outlined in this policy. **To ensure the effective implementation of this policy, Global Greengrants has appointed a Safeguarding Committee**, with the following roles and contact information provided below. The committee will provide oversight of the implementation, review, and updating of the Values and Conduct Charter, as follows:

(i) **A Focal Point** ^[3] will be appointed and responsible for:

- The full implementation of the Values and Conduct Charter.
- Working with Global Greengrants' President and CEO and Global Greengrants UK's Executive Director to ensure the necessary resources are made available, and that crisis management processes are developed in a timely fashion.
- Should a report concern the President/CEO and ED themselves, the **Chair of the relevant (global or UK) Board of Directors** would substitute in place in the committee.

(ii) **A staff nominated representative** for the Values and Conduct Charter^[4], whose role it will be to monitor and follow up on the implementation of this policy, to ensure that disputes are resolved in a timely manner. This position will rotate every 2 years, on the review and renewal of this policy.

(iii) **Global Greengrants' Director of People and Culture:** The Director of People and Culture will maintain a Values and Conduct Charter Register to document any and all complaints as they come in, including the process undertaken to address the same, the time within which this was responded to, and the date the complaints were resolved. This register will remain confidential, except to members of this committee.

(iv) **A representative from the Advisory Network:** This individual should not be a member of the UK or US staff or board representatives, and reside in and come from the Global South.

(v) **One External Representative:** This individual should represent and demonstrate expertise in social and environmental justice, should reside in and come from the Global South, and be independent, in that they should not receive compensation from,

or service the Global Greengrants network or Global Greengrants US and UK entities in any way.

9. The Committee is responsible for ensuring the implementation of this policy annually, and thoroughly reviewing the same once every 2 years, or earlier as may be deemed necessary. It may be supported by professional expertise and consultants as required, both internally and externally.

10. All complaints are to be submitted to **People and Culture, at this email ID: feedback@greengrants.org**.

11. In cases where one of the individuals of the committee is the accused/perpetrator, they will step down from the committee and an alternative external representative (preferably an expert from the field of social and environmental justice) will be invited to serve in their place, until such time as the investigation is completed. Should the person accused be cleared of all charges with substantial proof to support the same, they may be re-invited to serve on the committee after a period of one year (to provide time for any supplementary evidence or feedback that may emerge after the committee has concluded its report).

Section 2: Policy Framework

Key Definitions

This policy refers to certain terms, the meanings of which are clarified below in how they apply to this policy and its implementation^[5].

(i) Vulnerable Adult/s: Refers to people over the age of 18 years who are at higher risk of abuse or marginalization, or "whom are unable to take care of themselves, or unable to protect themselves against significant harm or exploitation," or those who require support and assistance to protect their safety^[6]. This could be owing to their sexual orientation, sex, gender identity, religion, caste, HIV Status, Disability (lifelong, temporary, or acquired), place of birth, marital status, occupation, mental health, and political opinions, amongst others.

(ii) Individual/Adult: Refers to people over the age of 18 years.

(iii) Children and Adolescents: Refers to people between the ages of 1-14 years.

(iv) Young Persons/Young People: Refers to people between the ages of 15-24 years.

(v) Coordinators and Administrators: Refers to people based in the regions where Global Greengrants funds, and who support advisors and Global Greengrants staff in the grantmaking operations and efficient functioning of the advisory boards and are appointed to these roles under an appropriate agreement with Global Greengrants.

(vi) Advisors: These are volunteers for Global Greengrants, setting grantmaking strategies and making recommendations on grantees, as well as accompanying grantees in their work.

(vii) Partner: Understood here to mean partner organizations such as Global Greengrants's regional sister funds, pooled funds, donor advised funds, and global NGOs acting as advisory partners for Global Greengrants. These are independent organizations, subject to fiscal partnership agreements with Global Greengrants.

(viii) Donors: An individual or organization that grants financial or in-kind gifts to Global Greengrants and/or other partners in the Global Greengrants network to advance a vision for and work towards achieving social and environmental justice.

(ix) Grantee partner: An organization that receives financial resources from Global Greengrants to advance a vision for and work towards achieving social and environmental justice.

Definitions of Violence

{Warning: This section contains explicit definitions of abuse, harassment and harm.}

(i) Abuse^[7]: Abuse from which all individuals should be protected includes but is not limited to all forms of exploitation and ill treatment. These forms could be financial, physical, sexual, emotional, psychological and include enticement into illegal activities, ill treatment, neglect and/or negligent treatment, commercial and/or other forms of exploitation. These would result in stigma, discrimination, a threat to harm, actual harm and/or potential harm to the person's dignity, health, development, safety, survival and wellbeing in the short and longer term.

(a) These instances are particularly recognized in contexts where relationships between individuals are those based on trust, power, and/or are of responsibility, irrespective of motive (intentional/unintentional) and a lack of knowledge or ignorance.

(b) Physical abuse may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating, or otherwise causing physical harm. Physical harm or ill treatment, deliberate burning with an object, attempted strangulation, and female genital mutilation.

(c) Psychological and emotional abuse is 'Persistent emotional harm that causes a severe and long-lasting impact such as trauma. It may involve saying to a person that they are worthless, unloved or inadequate. It may involve seeing or hearing the abuse of another, including domestic abuse, and may mean the person is bullied, intimidated and/or frightened. It can occur as the result of a 'one-off' event but is usually the result of frequent and persistent behavior. Serious emotional abuse can lead to significant impairment of a person's social, emotional, cognitive, intellectual development and/or disturbance of their behavior. Some level of emotional abuse is involved in all types of maltreatment, though it may occur alone.'

(d) Neglect is the failure to provide (intentionally or unintentionally) sufficient protection, care, and basic necessities such as food, clothing, shelter, and supervision, as appropriate in the specific context.

(ii) Sexual Abuse and/or Harassment: Sexual harassment encompasses a wide range of behaviors, intentions, and actions that can be direct/overt and subtle/indirect and are all considered to be non-consensual. These include requests for resources (financial grants and other types of support), favors (those that are unwelcome, sexual, or with the intent to harass), verbal manipulation/threats, stalking, unwelcome advances and other non-verbal, verbal, or physical conduct of a harassing nature, where:

(a) Harassment:

(I) Is made explicitly or implicitly a term or condition of employment, grants funding, or otherwise, in circumstances where pressure, threats (both overt and covert), and/or intimidation is used against another person to bully them, make them feel uncomfortable, and in circumstances where an individual or set of individuals are using a position of influence and/or seniority to assert power over another individual who is vulnerable to the same.

(II) An acceptance or rejection of harassment is used as the basis for employment decisions, grants funding, or participation/payment from the funded grant activity.

(III) Behaviors/actions/words that negatively impact the general working environment, healthy work conditions, and mental health of an individual.

(IV) The harassment has the purpose or effect of interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

(V) Implied or explicit current and/or future promise/threat of preferential/detrimental treatment.

(VI) Treatment and humiliation that threatens the safety, security, and well-being of an individual or group or organization in the network.

(b) Sexual Harassment:

(I) Advances that include physical and/or other forms of contact that involve unwelcome and explicitly sexual overtures.

(II) Making inappropriate and offensive remarks, including those that are sexually colored.

(III) Showing or viewing pornography against the individual's consent or during Global Greengrants work time or when representing Global Greengrants.

(IV) *Both Sexual Harassment and Harassment* can occur between people of the opposite and/or similar sex/gender/sexual orientation/gender identity, between peers or between people at differing levels of power and/or organizational hierarchy and/or the Global Greengrants network, and/or may involve a single incident or repeated incidents over a longer period.

(V) *Whether or not a particular action or behavior constitutes sexual harassment is determined by the effect on the recipient, independent of the intention of the perpetrator^[8].*

(iii) Definitions of Discrimination, Bullying, Intimidation, and Exploitation:

(a) Includes, but is not limited to, behavior, intentions, and actions displaying threats of harm and/or abandonment, verbal and/or racial abuse, isolation, and humiliation.

(b) The mistreatment of someone by someone senior/in a position of power and the withdrawal of supportive social networks and/or services.

(c) Exploitation is understood here as both transactional and structural. It includes creating, inflicting, or perpetrating circumstances to take unfair advantage of another person/other persons, using another person's vulnerability for one's own benefit. It also includes contexts where institutions or systems are designed to unfairly benefit one group of people to the detriment of others.

(d) Exploitation is also understood as circumstances that can be both harmful (to one party) or mutually beneficial (to both parties). In the latter, this includes circumstances where explicit consent is taken, if the circumstances in which consent was obtained remain unfair.

(iv) Definitions of Anti-Fraud, Bribery, and Corruption:

(a) This Values and Conduct Charter holds a zero tolerance policy of fraud, bribery, corruption, and other forms of illegal activities, and is committed to enabling behavior that is honest and with integrity, maintaining the highest possible ethical standards.

(b) It considers bribery to include an inducement, payment, reward, and/or other illegal advantage offered, promised, or provided to any person or organization in order to gain any form of commercial, regulatory, personal, or contractual advantage. This may include forms other than money, such as valuable gifts, sexual and/or other favors, hospitality, entertainment, employment of family members, charitable donations, and may be done through third parties.

(c) Examples of fraud and corruption risk include, but are not limited to:

- Financial record-keeping and accounting discrepancies
- Absent, false, or incorrect records
- Excessive or unusually high compensation without any supporting evidence

- Unusual payment patterns or structures, use of shell companies, or other financial instruments
- General purpose or miscellaneous accounts used to hide improper payments
- Over-invoicing, false or incorrect invoices, travel and/or expense forms, and unrecorded transactions
- Engagement of an unqualified third-party consultant
- Third-party refusal to certify or provide information about their conflict of interest, or comply with anti-corruption requirements
- Request for remuneration to be paid to a third-party, in cash or untraceable funds.

(d) This Values and Conduct Charter should further be read in conjunction with the Global Greengrants UK Anti-Bribery Policy in accordance with the UK Bribery Act 2010 which is legally binding for the UK charity, and the provisions outlined in the Policy are in addition to the above. See pages 20-23 of this document for the Global Greengrants UK Anti-Bribery Policy.

Guiding Principles

Global Greengrants Fund is guided by core values^[9] that inform its work. These underscore its Values and Conduct Charter, and recognize a commitment to:

- Environmental sustainability of ecosystems, recognizing the needs of people today and future generations.
- Social justice practiced locally and globally, as framed in the Universal Declaration of Human Rights, as well as accountability, compassion, dignity, love, and respect.
- Diversity, equity, and inclusiveness regarding biology, culture, ethnicity, geography, gender, language, race, and sexual orientation.
- Decentralized decision-making, including activist-led strategies and grantmaking to distribute power and build movements.
- Trust in advisors, grantees, and their local knowledge regarding how to define and address challenges, as well as make good decisions.
- Ethics and integrity in all activities.
- Flexibility and responsiveness that is adaptive, embraces complexity, is open to opportunities, and promotes resilience.

Values and Conduct Charter

The Values and Conduct Charter underscores these guiding principles, requiring all individuals to commit to standards of behavior that:

- (i) Promote a culture of diversity/tolerance/welfare, well-being, and create conditions that encourage and allow all individuals to thrive. Such a culture promotes empathy, sensitivity, acceptance, and is free from discrimination, bullying, abuse, and violence. This highlights ensuring an individual's own actions protect others from harm, and reinforce their own and others' rights to safety and well-being.

(ii) Enable an equitable approach by recognizing, providing, and supporting individuals who face conditions of discrimination and inequality, with resources (information and services) to empower their knowledge and capacities. This prioritizes practices that hold space for dissent, ensure the contribution of diverse voices, particularly those who are vulnerable and marginalized in different contexts, and being committed to shifting and challenging power and knowledge production.

(iii) Co-create and provide an environment at work that is safe, secure and non-judgmental. These should cover/meet all standards of protection in the financial, physical, mental, and emotional contexts described in this policy.

(iv) Recognize that power exists and operates at various levels of organizational hierarchy, both internally within and across teams, in management and leadership structures, among volunteers, partners, and grantees.

(a) Further recognizing that Global Greengrants, headquartered in the USA and UK, operates in a philanthropic landscape where funding sources have historically derived from two centuries of capitalism, racial injustice including slavery, caste-based discrimination and violence, white supremacy, and patriarchy.

(b) At the same time, philanthropy itself can reinforce structural and systemic inequality and injustice through existing funding practices, creating an active need to challenge and change the same, as a collective network/community.

(v) Commit to consistently listening, learning from, and challenging how power and inequity exists and operates between funders, grantees, and the communities they serve, and improve institutional practices^[10].

(a) Listen to and value the voices of all individuals, in particular, those experiencing vulnerabilities.

(vi) Recognize the right of every individual to agency, respect, equality, and safety at the workplace and in the Global Greengrants network, irrespective of their identities. Forms of abuse can vary and harassment, stigma, discrimination, and violence in any manner is a violation of an individual's most fundamental human rights.

(a) Recognize that in different contexts, intersectional identities are likely more^[11] vulnerable to inequalities and are at increased risk of harm.

(b) Recognize that behavior is considered discriminatory if the person who is the recipient of the same, has reason to believe that reporting/protesting against the harassment will have an adverse effect on their morale, mental health, working conditions, work performance, and/or career prospects.

(vii) Recognize the full agency of every individual to take decisions over their bodies and lives. Each individual is best placed to look after their own well-being and to judge their safety.

(viii) Actively commit to creating safe spaces, stopping and restricting inappropriate, offensive, or abusive language, suggestions, and/or behavior, and supporting individuals to seek redressal^[12].

(ix) Are committed to ensuring fiduciary relationships are not abused. This includes:

(a) Declaring at the earliest opportunity any actual or apparent conflict of interest.

(b) Developing, maintaining, and consistently applying effective controls to prevent fraud and corruption at all levels, ensuring that if and where these occur, a vigorous and prompt investigation takes place and appropriate disciplinary and legal action is taken in all cases, where necessary.

(c) Taking appropriate and reasonable steps to recover any financial losses, and ensuring such risks are taken into consideration into fiscal, regulatory, and program planning.

(x) Ensure the principles of informed consent are understood and practiced at all levels of decision making and implementation. This requires agreement (to be explicitly verbal or in writing) freely given to an action based on knowledge and an understanding of what is involved and are possible/likely consequences.

(xi) Believe that responses, mediations, and resolutions in cases where this code is violated be rooted in *Restorative and Healing Justice*^[13].

(i) Restorative Justice seeks to analyze and challenge deep rooted structures to bring social transformation that actively seeks to prevent harm.

(ii) Healing Justice recognizes the generational contexts in which oppression operates, and subsequently, its consequences on ourselves physically, spiritually, emotionally.

(iii) This implies building a holistic understanding of both trauma as well as healing, as a pathway to ensuring justice and accountability, by suggesting collective practices.

(iv) It provides an opportunity, where there is willingness, for reparation rather than punishment (ways of which are described in the Redressal Mechanisms Section of this policy).

(v) It centers putting the power of healing in the hands of the individual, recognizing and embracing the diverse socio-cultural, political, and historic contexts in which healing is practiced and understood.

(xii) All complaints relating to this Values and Conduct Charter will be immediately investigated by the Safeguarding Committee. When a violation has been determined to have occurred, it will be handled in a swift and clear manner. In cases of harassment (any kind) and/or illegal behavior, Global Greengrants will swiftly end all association, partnership and/or employment (etc) as concerns the violating individual(s). If an applicable law has been violated in the country where the violation occurred, Global Greengrants will refer the matter to appropriate authorities. For other cases that are amenable to restorative justice, Global Greengrants outlines steps to take to help resolve the issue in Section 3.

Statutory and Legal Framework

These above principles and practices apply equally across the Global Greengrants network. They encompass national statutory responsibilities and government guidelines, and will include all relevant legal requirements in the countries where Global Greengrants operates. Where national policies should conflict with this Values and Conduct Charter, this policy abides by the following international intergovernmental treaties and agreements, that apply universally in all countries that have ratified the same^[14]. In such instances where national policies conflict with the Values and Conduct Charter, Global Greengrants cannot be held liable for/on behalf of the actions of its network members.

- Universal Declaration of Human Rights (UDHR)
- United Nations International Covenant on Civil and Political Rights, 1966 (ICCPR)
- International Covenant on Economic, Social and Cultural Rights, 1966 (ICESCR)
- Convention on the Rights of Persons with Disabilities, 2006 (CRPD)
- Convention on the Elimination of All Forms of Discrimination against Women, 1979 (CEDAW)
- Convention on the Rights of the Child, 1989 (UNCRC)

Section 3: Redressal Mechanisms

Reporting

(i) Global Greengrants is ethically committed to encouraging an open environment where all individuals and partner organizations can express themselves and raise issues that are responded to in a timely and appropriate manner. This includes supporting/protecting individuals and partner organizations who report violations of this Values and Conduct Charter. Global Greengrants recognizes that committed resources and leadership commitment is required across all levels of the network to strengthen timely responses and facilitate open communication that increases access to information and trust and improves accountability to ensure a working culture where individuals are safe and can thrive.

(ii) The Values and Conduct Charter applies to all individuals in Global Greengrants' network. They can approach the Focal Point and/or other members who have oversight of the Values and Conduct Charter at the contact details provided in this document.

(iii) Complaints can be verbal or written against any stakeholder (for example, staff, advisors, coordinators, partners, board members) within the Global Greengrants network. Should individuals require support for complaints against a third party outside the Global Greengrants network (for example, an individual or organization at an external meeting) to whom the policy does not apply to, they are encouraged to reach out to the Focal Point who can assess how support could be provided in such instances, to the fullest possible measure.

(iv) There is no time limitation on the reporting of complaints; however, individuals are encouraged to report as soon as possible for timely action to be taken, once they feel comfortable, safe, and secure to do so.

(v) Once an individual has filed a report, they should normally receive an acknowledgement of receipt from the Focal Point, no less than within 5 working days.

(vi) A complaint submitted must be reviewed paying attention to confidentiality/privacy. Based on the information received, the Committee may launch an investigation or ask for additional information and/or clarification to assess the same.

(vii) In all instances, the Director of People and Culture must be notified of complaints, maintaining confidentiality of the complainant, unless the complaint is against the Director of People and Culture, in which case the CEO of Global Greengrants will be notified. The complainant reserves the right to waive confidentiality, should they not wish to be so.

(viii) All individuals have equal right to protection regardless of their relationship with Global Greengrants and irrespective of their identities and/or socio-economic status.

(ix) Complaints shall be confidential as a matter of policy and practice, but the action taken may be communicated to the network.

(x) The Values and Conduct Charter offers an informal (mediation) and formal process (investigation) to resolve complaints, based on the preference of parties involved. Any response from Global Greengrants should center the voice/s and feedback of the person/individuals who have made the report, their context that may include consulting with local partners, and other experts well positioned to provide support (legal and/or emotional, for example). It should consider primarily, the risks to individuals involved, their digital and physical safety, as well as their access to resources for support (financial, emotional, physical - as relevant).

(xi) Should the resolution determine that legal action or reporting to the police is necessary, a full risk assessment of the potential implementations for backlash on the complainant should be audited before actions are taken. Additionally, cases that are registered with local authorities should ideally have local representatives as part of the same. Should a decision be taken to not report cases, this must be documented. In cases where legal support is

required, legal representation of the complainant or complainant cannot represent a conflict of interest (i.e., they may not have any form of existing association/partnership with members of the network).

(xii) Global Greengrants recognizes that reporting can be difficult, painful, and intimidating for those experiencing abuse. The burden of developing evidence, finding individuals (thus, having to prove harassment) who will corroborate is not on complainants, and a lack of this should not deter individuals from reporting. The Safeguarding Committee is responsible for conducting a fair and ethical investigation of the complaint.

Informal Processes (Mediation)

(i) An informal mediation process may be offered to both parties, should they explicitly request the same and the Safeguarding Committee deems it appropriate. All mediation processes require the explicit consent of all parties involved.

(ii) This discussion will be coordinated by a member of the Committee, through process led by a facilitator, to explore if 1) restorative justice is either preferred or feasible, 2) there are risks to the safety and well-being of others and the individuals involved in the complaint by the continued presence of the alleged perpetrator.

(iii) In the case of restorative justice, the facilitation enables communication between the complainant and complaine, where the latter takes responsibility for their actions and acknowledges the harm caused. The resolution process is subsequently based on mediated dialogue to identify a resolution that is acceptable to both parties, through a facilitator.

Formal Processes (Investigation)

(i) A formal process may be requested by either party, or deemed necessary by the Safeguarding Committee. This process must be started within 30 days of the request for a formal process. All individuals involved will be informed of this process and requested to cooperate. If the initial complaint was made orally, it will be translated into writing at this stage.

(ii) The complainant will be asked to submit (or with the support of a committee member/expert) a statement in writing with details of the complaint, with supporting evidence and individuals who may be able to corroborate, if this is available.

(iii) The alleged perpetrator will be informed in writing of the complaint by a representative of the committee.

(iv) During the course of the investigation, the Committee members may conduct interviews with all individuals who can provide context, insights, and help substantiate and/or resolve the grievance. They may also examine confidential records and employee data as part of the same. This information is to remain confidential at all times.

(v) Both the complainant and the alleged perpetrator will have the right to review the details of the complaint made by both parties.

(vi) The process followed by the Committee, as well as their reflections, will be recorded in writing.

(vii) Global Greengrants may institute a formal Anti-Harassment and Discrimination Committee (that mediates formal and informal disputes received globally). Redressal mechanisms lie with the five members of the Safeguarding Committee, who may bring in an expert or facilitator to conduct the mediation process, in their presence.

(viii) If the claim is substantiated, Global Greengrants' association with that individual will result in the immediate and permanent dismissal/termination of contract and/or removal from any advisory and associative capacities the individual serves in. Additionally, the committee may institute a formal enquiry, even if the complainant is satisfied with the informal process, to meet institutional and statutory obligations.

(vi) In cases where informal mediation has been successful at addressing the grievance, the committee will submit a report and close the case, recommending measures that will be shared back with relevant parties in the Global Greengrants network to ensure that the recurrence of such a situation is prevented in the future.

Confidentiality and Protection

(i) The Committee will address grievances and carry out mediation processes in a manner that respects and protects the full confidentiality and privacy of complainants, alleged offenders, and any other individuals who provide relevant information.

(ii) In exceptional situations where the law requires so, the Committee may decide to set aside the commitment to confidentiality, such as in cases where legal proceedings are initiated and the organization is required to disclose information, or in cases where disclosure is deemed necessary to protect the interests of others. In such cases, the Committee must provide a written report to the Global and UK Boards of the organization, before proceeding with the same.

(iii) Global Greengrants will provide complainants with full support and safeguarding measures to ensure that further harassment or discriminatory treatment of complainants on account of having filed a complaint by peers and/or individuals in positions of power does not take place.

(iv) Information not usually available in the public domain or readily available from another source, which has a degree of sensitivity, is subject to a duty of confidence^[16]. Information in this context, received for one purpose, will not be used for another without the consent of the individual the information was provided from, except in exceptional circumstances (for example: to prevent further harm).

Digital Security and Safety

(i) Global Greengrants respects the autonomy and agency of individuals within Global Greengrants and recognizes that 'privacy is a right, as well as a collective responsibility'.

(ii) Any information/data on/related to complaints made that are obtained will be stored using the highest security standards, including, where necessary, encryption. Global Greengrants complies with standards outlined in the General Data Protection Regulation (GDPR).

(iii) Any documentation (across all print media and including social media) should be used / taken with the full and informed consent of the individuals concerned. Photographic material should respect the dignity, rights, well-being and safety of all individuals. Any individual desire not to be photographed should be respected, and cannot be used without their consent.

(iv) In the case of minors, and in cases where individuals are unable to provide consent due to disabilities, no photographs should be used without their direct consent and those of their guardians. In all cases, photographs that provide opportunity for facial recognition (pictures of faces for example) should be avoided.

(v) Unauthorized access to data in the context of this policy, and generally, is considered a breach of the Values and Conduct Charter. Such instances will be investigated immediately and appropriate action taken.

(vi) In case of grievances reported, all individuals concerned with the report will, in good faith, not use social or press media to resolve or address the grievance, outside of the formal or informal process consented to, until it has been completed.

(vii) Global Greengrants does and will not censor any parties from communicating on personal social media channels. It will, however, declare a breach of a good faith process, should an ongoing investigation be subject to social media, and declare that investigation void should confidentiality be compromised or the findings of the investigation be impacted. It reserves the right to terminate its association with individuals associated in this context.

Redressals

Interim Measures

(i) This policy empowers the Safeguarding Committee to recommend interim relief measures at the request of the complainant, with the objective of providing support to the same. The nature of these measures is to be decided on a case to case basis, however, they are to fully reflect the Guiding Principles of this Values and Conduct Charter.

(ii) Global Greengrants, with support from the Committee, is authorized to grant immediate reliefs ensuring the respondent is safe, and additionally that they have support and tools to take care of their mental health and overall well-being. This could include transferring duties as well as roles and responsibilities for an interim period, as well as granting paid leave (where relevant) to ensure respondents are not affected further, and no individuals are put in a further vulnerable position.

(iii) Global Greengrants has a zero tolerance policy for any form of discrimination and abuse. If the claim is substantiated, the Committee will make recommendations, which can include, but are not limited to:^[17]

(a) Discipline less than termination may take the form of a verbal warning, a written warning, a performance appraisal indicating substandard performance in one or more areas, probation, or suspension.

(b) Forfeiture of increments (where permissible by law).

(c) Which of these options is chosen or whether any of them is used prior to termination depends on the seriousness of the situation.

(d) The evaluation of the seriousness of the offense will be made by the Safeguarding Committee.

Section 4: Accountability

Commitments

(i) Developing a culture of trust, accountability, and care does not happen overnight, and a consistent approach to sensitizing, informing, and training individuals who comprise of Global Greengrants' network, beginning with Global Greengrants staff and global and UK governance board members, is needed to ensure commitment and accountability is deeply embedded within network culture.

(ii) Global Greengrants is committed to dedicating resources on an ongoing basis to strengthening internal communication between and amongst its staff and network - including conflict resolution skills, building capacities to recognize, prevent, and report abuse, and advancing a collaborative approach to sharing power, leadership, and decentralized decision-making. This is key in ensuring that individuals and organizations are empowered to create a secure and healthy working environment. As part of this work, Global Greengrants is committed to operationalizing learning spaces that offer a safe space for individuals to learn and unlearn.

(iii) Every individual, regardless of role or seniority, is responsible for maintaining and creating a respectful and harmonious work environment, including having read and agreed to the Values and Conduct Charter.

(iv) Senior leadership roles in the organization play an important role in recognizing the impacts of their power, and to ensure the Values and Conduct Charter is prioritized and incoming staff and individuals in the network are on-boarded appropriately.

(v) This policy will be shared with individuals and partner organizations as they enter into agreements/roles and relationships with/in the Global Greengrants network. Disagreements along with the inability to commit to any of these guidelines should be shared transparently at the outset.

(vi) Training and capacity building that relates to this policy will be organized, prioritized, and implemented through existing initiatives in Global Greengrants, such as the Diversity, Equity, and Inclusion Initiative, and other opportunities as may be relevant at the time.

Anti-Bribery Policy

INTRODUCTION

Global Greengrants Fund UK policy is that the affairs of the organisation should be conducted in an honest and ethical manner. There is zero tolerance for bribery and for corruption. This policy document provides guidance in accordance with the UK Bribery Act 2010 (“Act”) and applies globally. If you are concerned about any practice or transaction, irrespective of the Act, you should report this immediately to your Manager or a Director, or to a Trustee. This policy applies to all staff, employees and other associates, whether located in the UK or overseas and all working under contractual arrangements with Global Greengrants UK. It applies to relations with all individuals or organisations, staff, employees and associates come into contact with during the course of their work. Greengrants will review this policy regularly.

WHAT IS BRIBERY?

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. The Act defines bribery in terms of an intention to encourage or induce improper performance by any person, in breach of any duty or expectation of trust or impartiality; so a bribe will still be an offence even if it is not acted on. Under the legislation, ‘improper performance’ will be judged by the courts in accordance with what a reasonable person in the United Kingdom would expect, in relation to the function or activity concerned.

Bribes may not be obvious. If a supplier gives your nephew a job, and makes it clear that in return they expect you to use your influence in the business for their benefit, this is unlawful. It is also an offence to arrange to pay an additional amount to a foreign official to speed up an administrative process, such as clearing our goods through Customs or obtaining registration in a foreign country.

The aim of this policy is not to prohibit normal and appropriate hospitality being given to or received from third parties, but gifts and hospitality must not be given or received with the intention of influencing a third party to provide a business or personal advantage. You should ensure:

- The gift or hospitality offered or received complies with local law;
- It is given in the name of Greengrants, not in your name;
- It does not include cash or a cash equivalent (such as gift certificates or vouchers);
- It is appropriate. For example, in the UK it is customary for small gifts to be given at Christmas;
- Considering the reason for the gift, it is appropriate in terms of type, value and timing;

- It is given openly, not secretly;
- It is not offered to or accepted from government officials or representatives, or politicians or political parties, without the prior approval of a Greengrants director or Trustee.

It is not acceptable for you (or someone on your behalf):

- To give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- Accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them or a business advantage will be provided by Greengrants in return;
- Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation of a business advantage;
- Threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- Engage in any activity that might lead to a breach of this policy.

OFFENCES UNDER THE UK 2010 BRIBERY ACT

There are four types of offence covered under the Act, targeting:

- The payer of a bribe;
- The recipient of a bribe;
- Bribery of foreign public officials ('FPO');
- Organisations that fail to prevent bribery.

As much of Greengrants' work is conducted with FPO's, it is important to understand who these people are. Section 6(5) of the Bribery Act 2010 closely reflects the OECD's Convention, which describes an FPO as: "Any person holding a legislative, administrative or judicial office of a foreign country, whether appointed or elected; any person exercising a public function for a foreign country, including for a public agency or public enterprise; and any official or agent of a public international organisation."

The offence of bribing an FPO in section 6 of the 2010 Act extends to individuals who are not part of government and includes individuals who "exercise a public function." From a practical perspective, this distinction may not matter very much. Although the test is lower for an FPO, most classic instances of corruption will infringe both the private person and FPO offices, under the 2010 Act. While it does depend on the facts, it is likely that even if an employee is not an FPO, liability will still arise under Section 1 of the 2010 Act.

YOUR RESPONSIBILITIES

You must ensure that you read, understand and comply with this policy. The policy is communicated to all new workers as part of their induction process and is communicated, with

relevant training, to existing workers. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for Greengrants UK.

You must notify your Manager or a Trustee as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. For example, if a client or potential client offers you something to gain a business advantage, or indicates to you that a gift or payment is required to secure their business or cooperation. The manager or trustee will record such information so it can be properly investigated, the risks assessed and the appropriate actions and measures taken.

Greengrants is required to keep financial records which will evidence the business reason for making payments to third parties. You must therefore declare and keep a written record of all hospitality or gifts accepted or offered, and ensure that all expenses claims relating to hospitality, gifts or expenses incurred are submitted in accordance with the expenses policy and specifically record the reason for the expenditure.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

The penalties under the Act on conviction include unlimited fines, for an individual or organisation. Prison sentences of up to ten years may also be imposed on an individual. Individual senior managers or trustees may be prosecuted if an offence is proved to have been committed by a corporate body with their consent or connivance. An organisation convicted on indictment for failing to prevent bribery is liable to an unlimited fine.

RED FLAGS

In the international NGO sector in which Greengrants operates, we face a number of potential risks which reflect where we work, our activities, the nature of partner organisations and other stakeholders and the complexity of our activities. We need to assess the likelihood and potential impact of each risk and use them to inform our anti-bribery measures. Whilst not an exhaustive list, the following should be considered as key risk considerations:

- Geographical – risks may be higher in certain countries or regions within countries;
- Partners – the size, structure/governance of partners, adequacy of partners' control systems; partner selection processes; partnership contract and agreements; and partners' monitoring and control processes;
- Procurement – increased risk where processes are not fair or transparent. Procurement is a high-risk area for bribery.

The following circumstances are considered to be the areas where risks are most likely and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.

- You become aware that a third party engages in, or has been accused of engaging in, improper business practices;
- A third party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
- A third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;

- You receive an invoice from a third party that appears to be non-standard or customised;
- You are offered an unusually generous gift or offered lavish hospitality by a third party;
- A custom official asks you for an unofficial payment or gift to release imported goods or access to a particular project or camp; or
- A government official asks you for payment in order to secure your NGO registration beyond the normal official charge.

These latter two examples may also be considered to be “Facilitation Payments,” but are still considered to be bribes under the Act. Whilst in some countries these may appear to be part of local custom and practice, our policy must be one of zero tolerance and we must resist demands for such payments. Such incidents must be reported. We must identify where such problems are likely to arise and plan our activities to try as far as possible to avoid such situations arising.

PAYMENTS UNDER DURESS

It is recognised that due to Greengrants’ activities in certain countries, it may arise in rare and exceptional circumstances that individuals have no option other than to make illegal payments to protect loss of life, limb or liberty. These must be reported as soon as possible so appropriate action can be taken to try and avoid the situation arising again.

RAISING CONCERNS

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with your Manager or a Trustee.

Greengrants encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. Greengrants is committed to ensuring no one suffers any detriment or unfavourable treatment as a result of refusing to take part in bribery or corruption, or because they report something in good faith. If you believe you have received any such treatment, you should raise the issue initially with your Manager and if it is not remedied, and you are an employee, you should raise it formally through the grievance procedure.

^[1] *Global Greengrants Fund Employee Guidelines, Updated January 2018.*

^[2] *Global Greengrants Fund, UK | Europe, Safeguarding Policy.*

^[3] *Global Greengrants’ CEO and Global Greengrants UK’s Executive Director will serve in the absence of, or in such time as, a Focal Point is appointed by them.*

^[4] *It is important that this position be representative of staff support and be able to communicate well with staff. It does not have to represent or be part of Global Greengrants’ senior*

management teams. Global Greengrants is responsible for ensuring the staff representative receives appropriate capacity building to carry out this role effectively. They will be provided with the additional resources/consultants to be able to facilitate conversations that are legally and policy compliant.

^[5] This policy acknowledges there are multiple definitions of the age-range clarifying adults, children, adolescents, and young people in different contexts. Definitions in this policy are based on the UN Convention on the Rights of the Child and United Nations General Assembly Resolution [36/28](#).

^[6] Global Greengrants Fund, UK | Europe, Safeguarding Policy.

^[7] Global Greengrants is grateful to FRIDA - The Young Feminist Fund for permission and use of intellectual property from its Safeguarding Policy, that provide definitions in this section and contributed recommendations to this Values and Conduct Charter.

^[8] The YP Foundation, Definitions of Sexual Harassment 2019

^[9] DEI Concept Paper Final (English)

^[10] Global Fund for Children, Funder Safeguarding Collaborative.

^[11] Intersectional identities refer to contexts where individuals hold multiple identities and thus their vulnerability to inequalities is compounded due to the stigma and discrimination they face. For example, an individual is living with a cognitive disability, is a person of colour and is queer. Each of these identities can be marginalizations in certain contexts that face different forms of stigma and/or discrimination, including violence, thus making them more vulnerable than others.

^[12] This comprises (but is not limited to) behaviours to take action to ensure individuals are protected from harm, not remaining a silent bystander in instances where such actions are taking place, supporting and protecting individuals to report violations and encouraging safe spaces where the status quo can be questioned and challenged.

^[13] Definitions referenced from FRIDA - The Young Feminist Fund, Safeguarding Policy with due permission for use.

^[14] In the instance where a country has not ratified any of the mentioned international conventions, the full extent of the law within that country provides maximum legal recourse that is available to concerned parties.

^[15] Grievances as per Global Greengrants' Employee Guidelines are described as 'The subject of a grievance may be: working conditions and safety, discipline, separation from the organization, interpersonal working relationships, promotions and other job changes, sexual or other harassment, unequal application of employment policies, procedures and practices, and all forms of discrimination.'

^[16] A duty of confidence arises when one person provides information to the other in circumstances where it is reasonable to expect that the information will remain in confidence.

^[17] Global Greengrants Employee Guidelines - Updated January 2018