

# Eurasian Harm Reduction Association

## Code of Ethics

Approved by the Steering Committee

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# 1. Introduction

The Eurasian Harm Reduction Association (EHRA) Code of Ethics (the Code) is a set of fundamental principles, standards and policies to govern decisions and behaviour at EHRA. The Code clarifies an organization’s mission, values and principles, linking them with defined standards of professional conduct, as well as gives specific guidance for handling issues like compliance, integrity, anti-fraud, non-discrimination, anti-harassment policy and Conflict of interest.

The Code is intended primarily for EHRA’s employees and members, and together with the EHRA Code of Conduct the Code is a main guide and reference for employees and governing bodies to support day-to-day decision making. The Code also serves as statement of organizational values internally for EHRA members, as well as for partners with whom EHRA has contractual and partnership relations. The Code shows EHRA commitments for external stakeholders such as advocacy allies, potential EHRA donors, UN agencies, other national and international organizations.

EHRA requires governing bodies, members and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the EHRA, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

The following would be considered an “eligible person” and would fall under this policy.

- EHRA Governance structure (Steering Committee members, Advisory Board members and EHRA members);
- employees (including executive director, team leads, advisors, managers, officers, volunteers);
- contractors, consultants, service providers, suppliers, organizations, with whom EHRA has fiduciary relationship.

The Code is made up of 4 policies:

1. [Compliance, Integrity and Antifraud policy](#)
2. [Conflict of Interest policy](#)
3. [Non-discrimination, Anti-Harassment Policy and Complaint Procedure](#)
4. [Whistleblowing policy](#)

The Code was formulated and adopted by EHRA Steering Committee and included input from EHRA members. The Code should be revised depending on needs, but not less than once in 5 years. All revisions and amendments should be approved by the Steering Committee.

## 2. Values and Guiding Ethical Principles

According to EHRA's statute the organisation has mission to actively unite and support communities and civil society to ensure the rights and freedoms, health, and well-being of people who use psychoactive substances in the CEECA region.

The vision of EHRA is to have an active movement in each CEECA country that advocates for human policies and access to evidence-based and needs-based harm reduction services for people who use psychoactive substances.

EHRA as a whole organization, its members, and governing bodies in their decision-making activities are acting in the best interest of the organization and respect the following values and principles:

### 2.1. EHRA Values:

- Dignity
- Fairness
- Respect
- Equality
- Social justice
- Well-being
- Loyalty
- Honesty
- Commitment
- Efficiency
- Competence
- Freedom

### 2.2. Principles

- Equality
- Non-discrimination
- Participation
- Inclusion
- Transparency
- Accountability
- Meaningful Participation
- Trust
- Respect

### 3. Compliance, Integrity and Anti-Fraud Policy

This Policy outlines measures to mitigate and manage compliance risks, integrity risks and the prevention of and fight against fraud and corruption in all its operations and activities. As a non-for-profit public membership-based organization entrusted with donor monies the organization strives at carrying out its operations with the highest integrity and in compliance with the EHRA Code of Conduct and the best corporate governance practices for NGOs. All members of staff, as well as consultants, contractors, partner organisations and any other parties with a financial or fiduciary relationship with EHRA are expected to share this commitment.

Prevention is at the forefront of the EHRA's compliance, integrity and anti-fraud efforts and it benchmarks related policies and procedures with Lithuanian legislation.

#### 3.1. Compliance and Integrity

EHRA is committed to work ethically, honestly, and in full compliance with all laws and regulations applicable to the respective contexts, and to follow best practices and standards for NGOs in areas of accountability, governance, financial management, transparency, and ethics in order to promote sustainability. At the core of these efforts are the mitigation and management of compliance and reputational risks for EHRA.

EHRA has established an Ethical Committee and developed a reporting procedure described in the [Whistleblowing Policy](#) to manage risks and investigate suspected and alleged practices and misconduct of staff, the Executive Director, the Chief Accountant, Steering Committee members and the Chairperson of the Steering Committee.

#### 3.2. Definitions

**Fraud** defined as the use of deception with the intention of obtaining an unjust or illegal financial gain or other unfair advantage.

**Corruption** defined as a corruption, extortion, nepotism, patronage, influence peddling as well as offering, promising, giving, accepting or soliciting of money, a gift or other advantage as an inducement to do something that is illegal or a breach of trust in the course of carrying out an organisation's Anti-Fraud Culture and Practices

#### 3.3. Zero Tolerance of Fraud and Corruption

This Policy is based upon a zero-tolerance approach to fraud and corruption. Zero-tolerance means that EHRA does not tolerate any fraud or corruption in relation to any of our work and that all suspicions of fraud thought to be in breach of this policy are reported to EHRA.

It means that EHRA will take all suspicions of fraud seriously and assess, act upon, investigate and discipline all such cases as appropriate and in a professional, transparent and fair manner.

Failure to do so will result in disciplinary action up to and including the possibility of termination of employment or termination of the violating party's contract and/or partner relationship with EHRA. EHRA furthermore reserves the right, without prejudice to any other right or remedy available to it, to take such additional action, civil and/or criminal, as may be appropriate.

Staff members are prohibited from engaging in corrupt activities, both in their work and in their private life. Failure to comply will result in disciplinary action up to and including the possibility of termination of employment.

EHRA staff members are committed to staying accountable and transparent, to upholding EHRA's values and integrity, to following formal procedures, and to safeguarding EHRA's entrusted means. It is the obligation of everyone subject to this Compliance, Integrity and Anti-Fraud Policy to bring forward any related issues, questions, doubts or concerns to EHRA management.

EHRA is committed to ensuring that everyone subject to this Compliance, Integrity and Anti-Fraud Policy understands: a) the consequences of violating the policy as it applies to them; b) their duty to report all suspicions of fraud thought to be in breach of this policy to EHRA; and 3) how to do so according to [Whistleblowing Policy](#). EHRA is committed to use transparent, straightforward, and clear procedures, monitoring, checks and balances and documentation to avoid fraud and corruption in our work.

EHRA is committed to ensuring that any representation or hospitality promised, given, or received is modest, occurs within a standard business framework and aligns with donor regulations. Representation and hospitality must never compromise EHRA's integrity, neutrality, policies, and guidelines, or otherwise exert or attempt to exert an undue influence on any party.

Staff members are prohibited from promising, offering, giving, seeking, or accepting personal gifts or other advantages representing more than token value to or from persons of concern, donors, sub-grantees, suppliers, authorities or other EHRA stakeholders. Any gift(s) constituting an attempt to exert an undue influence on any EHRA staff or stakeholder are strictly prohibited. Staff involved in partner and beneficiary selection will exert enhanced caution in this regard.

EHRA strictly prohibits the promising, offering, giving, seeking, or accepting of representation, hospitality and gifts for staff involved in the procurement process.

EHRA is committed to ensuring that its sub-grantees, contractors and other parties who have financial or fiduciary relationship with EHRA know, understand and comply with this Compliance, Integrity and Anti-Fraud Policy in terms of the standards and behaviour the policy demands of them, as well as the consequences of breaching it, up to and including the possibility of termination of the violating party's contract and/or business relationship with EHRA.

### 3.4. Compliance and Fraud Risk Management

EHRA is committed to knowing and understanding the Anti-Fraud laws and regulations applicable to its projects and the areas in which it operates. EHRA and its staff is complying with Lithuanian and EU laws as well as the rules and regulations of its donors and applicable anti-Fraud legislation and guidance.

### 3.5. Ethical Committee

The Steering Committee of EHRA is responsible for creating of the Ethical Committee. Structure, procedures and regulations of Ethical Committee are approved by the Steering Committee.

Ethical Committee is responsible for identifying the major risks to which EHRA is exposed to, and for ensuring that appropriate systems, procedures and controls are in place. In the case of fraud or corruption, systems and controls should reduce the likelihood of fraud occurring, and the further procedures should outline EHRA's response to a suspected or actual fraud.

### 3.6. Risk register

Under the Executive Director supervision, EHRA is committed to preventing fraud by systematically assessing and reviewing fraud risks in its work and design its interventions and mitigating measures

according to these risks, also as they may relate to external parties, such as sub-grantees, contractors and other related Third Parties.

This assessing and reviewing should be done annually by EHRA management together with the Steering Committee and reflected in EHRA's Risk Register as a main monitoring tool to prevent potential risks in governance, decision making, finances, operational planning and program implementation, environmental and political situation in countries of EHRA's operation.

### 3.7. Reporting/investigations

EHRA is committed to meeting its obligations to report instances of fraud/corruption to relevant donors and to external authorities as appropriate and applicable to legal jurisdiction. The reporting procedures is described in the [Whistleblowing Policy](#).

EHRA is committed to taking all reported suspicions of fraud seriously and assessing, acting upon, investigating and disciplining all such cases as appropriate and according to professional, transparent and fair procedures.

EHRA is committed to protecting reporting persons' confidentiality and rights and does not tolerate retaliation against reporting persons (see [Whistleblowing Policy](#)).

EHRA considers knowingly making a false report of fraud to constitute a violation of this policy. Doing so will result in disciplinary action up to and including the possibility of termination of employment or termination of the violating party's contract and/or business relationship with EHRA.

Instances of actual or potential corruption will be properly and promptly investigated. The objectives of an investigation will be to:

- Confirm whether or not a fraud and/or corruption has taken place;
- Determine the appropriate subsequent action, depending on the findings of the investigation.

## 4. Conflict of Interest Policy

The purpose of this policy is to ensure fairness and a high standard of ethical conduct in EHRA's decision-making to protect the reputation and to ensure broad public trust and confidence in EHRA's decision-making and grant-making activities.

### 4.1. Definitions

- a) *Conflict of Interest* arise when financial or other personal considerations have the potential to compromise or bias professional judgment and objectivity. Conflict of interest can surface at both an individual and organizational level. In a professional setting, it is normal and acceptable to have these potential conflicts of interest, and it is therefore necessary to have routine disclosure and management of potential conflict of interest to prevent improper decision-making or actions.
- b) *Covered individual* means a member of the Steering Committee, an alternate, a member of any other EHRA governance committee, or any other subsidiary body of EHRA, and professional employees of the Secretariat.
- c) *Associated Person* means a Covered Individual's (i) spouse, minor child, or domestic partner.
- d) *Associated Organization* means (i) any organization, corporation or government in which a Covered Individual is serving as an officer, director, trustee, partner or employee, that receives or may receive funding from EHRA or with which EHRA has an agreement, contract, grant or relationship; or (ii) any person, organization, corporation, government or similar Organization with whom a Covered Individual is negotiating or has an arrangement concerning prospective employment.
- e) *Personally and substantially*. To participate personally means to participate directly or to attempt to influence the outcome of a decision-making process, including, for example, consideration of a matter at a Steering Committee meeting, or direct and active supervision of a subordinate in a matter. To participate substantially means that the Covered Individual's involvement is of significance to the matter.
- f) *Gift* means any gratuity, favour, discount, entertainment, hospitality, loan, forbearance, honorarium, or other item having monetary value. These include services as well as gifts of training, transportation, local travel, lodgings and meals, whether provided in-kind, by purchase of a ticket, payment in advance, or reimbursement after the expense has been incurred.

### 4.2. Individual Conflict of Interest

Conflict of interest is a situation where an EHRA official could be influenced to make decisions for improper reasons, specifically for reasons that relate to their own financial interests. It is the responsibility of all EHRA officials to disclose any personal financial interests that could relate to their work for EHRA, such that potential and actual conflict can be appropriately addressed.

A conflict of interest arises when a Covered Individual participates personally and substantially in any particular EHRA matter in which, to his or her knowledge, he or she or an Associated Person or Associated Organization has a financial interest, if the particular matter may have a direct and predictable effect on that interest.

In general, and without limitation, Conflict may be deemed to exist in the following situations:

- Where a Covered Individual's financial interests, or the interests of an Associated Person or Organization could affect the conduct of his or her duties and responsibilities with respect to EHRA or result in a reasonable perception that such a conflict exists;
- Where the Covered Individual's actions create the perception that the Covered Individual is using his or her position at EHRA for personal benefit or for the direct financial benefit of an Associated Organization.

Specific examples of such Conflict include:

- Steering Committee member advocating for approval of a particular grant in which his or her government, entity, or organization will serve as sub-recipient, implementing agency or play some other direct project implementation role or realize some other direct financial benefit;
- Steering Committee member advocating for approval of a particular policy from which his or her government, entity, or organization will realize some direct financial benefit;
- Steering Committee or Senior Management Team member using their position in the committee to advocate for or otherwise seek approval of any service contract between EHRA and an Associated Organization; or
- Senior Management Team members who are employees of a government, corporation, or organization participating in the assessment of a funding proposal in which an Associated Organization has any substantial interest.

#### 4.3. Organizational Conflict of Interest

Organizational Conflict of interest (OCOI) — that is, Conflict of interest arising from the relationships between EHRA and its donors or other partners. An Organizational conflict of interest may include situations in which the financial interests of EHRA or Covered individual, acting within his or her authority on behalf of the organization, may affect or appear to affect advocacy, research, education, or other activities of the organization.

The following principles shall guide EHRA in addressing OCOI:

- Because it is critical to the mission and reputation of EHRA to maintain the public's trust, EHRA advocacy, research, education, and other activities must not be compromised or perceived as biased by financial and business considerations.
- Because of its numerous and complex relationships with public and private entities, EHRA must be aware of any relationships involving financial gain that may compromise or appear to compromise its integrity.
- EHRA shall establish and maintain an oversight process to manage, reduce, or eliminate OCOI.

#### 4.4. Identification of Potential Organizational Conflicts of Interest

As a general guide, an OCOI may exist and a formal review will be warranted where EHRA, or any of its Covered individual, has a significant financial or governance interest in a company, including pharmaceutical company that itself has a financial interest in advocacy or research activities conducted at or under the auspices of EHRA.

The Steering Committee reserves authority to review and approve plans for managing, reducing, or eliminating OCOI involving:

- external relationships with an unusually significant financial impact that present a potential conflict;



- potential conflicts involving the Executive Director;
- potential conflicts that raise serious policy issues or have a significant public impact on the mission and reputation of EHRA.

In these instances of OCOI, the Executive Director shall consult with the Steering Committee. The Executive Director shall:

- implement an oversight process and administrative policies and procedures to address OCOI and to identify situations in which OCOI may arise;
- recommend and implement plans to manage, reduce, or eliminate OCOI;
- ensure that Covered individuals who act on behalf of EHRA adhere to these policies and procedures, follow applicable conflict management plans, and do not engage in activities in which there is an actual conflict of interest; and
- report to the Steering Committee annually all OCOI matters that do not meet the thresholds identified above.

#### 4.5. Transparency and disclosure

All Covered Individuals have a duty to disclose the existence of any actual or potential conflict of interest, including those that derive from Associated Persons or Organizations, and the nature of such conflict, whenever he or she becomes aware that a conflict exists or that a conflict is reasonably likely to occur or that there is the appearance of a conflict.

All Covered Individuals must complete and submit the attached “Conflict of Interest statement” to the Finance and Administration Team.

Conflict of Interest statement shall be updated regularly and whenever there is a material change in the information they contain and shall be maintained by Finance and Administration Team and made available for inspection by the Steering Committee or audit. Except as outlined above, these statements shall be maintained confidential.

An employee shall request authorization of the Executive Director before accepting an office or occupation outside his or her employment duties at EHRA or accepting an honour or decoration provided by an outside party if the proposed action may give rise to an actual or potential conflict of interest or the appearance thereof.

EHRA asks that the mentioned form shall be completed each time an EHRA Secretariat staff member, Steering Committee member participates in a partner and/or grantee/ supplies selection process. Form should be submitted to Finance and Administration Team or whomever is running the selection process on behalf of the Secretariat.

All individuals with significant EHRA decision-making responsibilities shall routinely and voluntarily identify, disclose, and prevent potential Conflict of interest. This applies particularly to EHRA Steering Committee members, Advisory Board, Treasurer, staff of EHRA Secretariat, consultants considered as staff and other individuals making financial decisions for EHRA.

Conflict of Interest statement form is provided to support routine disclosure and management of these potential Conflict.

- 1) EHRA encourages voluntary disclosure and emphasizes that this information is to be used in an open, collegial and non-punitive manner. EHRA will treat any disclosed information as confidential, to be used only by EHRA leadership to help avoid potential Conflict of interest in decision-making and actions.
- 2) EHRA will be attentive to preventing improper decision-making and actions caused by Conflict of interest, and views the following as reason for termination of a Steering Committee member's term, EHRA employment, or any EHRA grant or contract:
  - a) Recommending a grant, contract, or other financial transaction with the intention of personal financial gain without prior disclosure of the relationship.
  - b) Recommending a family member, business partner, or other related and interested parties for an EHRA grant, contract, or employment without prior disclosure of the relationship.
  - c) Taking bribes, gifts, or contracts based on perceived or actual influence over EHRA financial decisions.
  - d) Making strategic decisions for EHRA that are not in the primary interest of the organization.
- 3) In development and implementation of processes to select project partners, consultants and grantees, the Chair of the Steering Committee and the Executive Director will determine the most appropriate approach to address Conflict of interest in relation to that particular process. Possible approaches would include:
  - a) Any staff person, Steering Committee member or review panel member would not be permitted to engage in any selection process in which an organization or other entity with which they have a financial, organizational or familial relation.
  - b) Any staff person, Steering Committee member or review panel member would recuse themselves from the review and selection of a proposal from an organization or other entity with which they have a financial, organizational, or familial relation.

If there exists a reasonable cause to believe that a staff member has failed to disclose actual or possible Conflict of interest, the responsible manager shall be informed of such belief and afford the staff member an opportunity to explain the alleged failure to disclose.

If, after the staff member's response and after making further investigation as warranted by the circumstances, the responsible manager determines the staff member has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action.

## 5. Non-discrimination, non-bullying, anti-harassment policy

EHRA values a safe and inclusive work environment for all staff and expects that EHRA members and staff treat others with dignity and respect. EHRA has a policy of zero tolerance of behaviour that is discriminatory, harassing or bullying, including sexual harassment.

As an organization, EHRA will:

- Provide a safe and inclusive workplace where all staff and members are treated with dignity, courtesy and respect;
- Provide a workplace where equality and inclusion are integral to how we work, which creates a positive working environment and culture for us all;
- Provide a safe, effective and accessible procedure for complaints;
- Actively promote and support appropriate standards of workplace conduct at all times supported by and in reference to the EHRA Values and Principles;
- Treat all complaints in a professional, sensitive, fair, timely and confidential manner; and will take appropriate action when a complaint has been substantiated and proven to have occurred;
- Ensure any acts of victimisation or retaliation are investigated and dealt with promptly; and take immediate and appropriate action following confirmation and substantiation that a malicious complaint had been lodged.

This policy should be read in conjunction with other EHRA's policies, Code of Conduct and Lithuanian laws.

### 5.1. Definitions

**Inclusion:** is ensuring all staff are valued, respected and supported. It focuses on the needs of every individual and ensuring the right conditions are in place for each person to achieve his or her full potential.

**Harassment:** is any form of behaviour that is unwelcomed, unsolicited, unreciprocated and usually (but not always) repeated. It is behaviour that is likely to offend, humiliate, or intimidate. It can make it difficult for effective work to be done by the staff member or groups targeted or affected by this behaviour. For harassment to occur, there does not have to be an intention to offend or harass. It is the impact of the behaviour on the person who is receiving it, together with the nature of the behaviour, which determines whether it is harassment.

Harassment is any type of behaviour that:

- The recipient does not want; and
- Offends, insults, humiliates or intimidates the individual;
- Can be threatening, blackmailing or demanding in nature;
- In the circumstances, a reasonable person should have expected would offend, insult, humiliate or intimidate; and
- May directly result in the recipient feeling stressed, anxious, fearful; and is either
  - Sexual (see below), or
  - Targets an individual or group (can be 2 or more) because of their: race, nationality, ethnicity, class, caste, social origin, pregnancy, parental status, family/carer's responsibility, marital status, disability, sexual or gender orientation (including heterosexual or LGBTIQ – Lesbian, Gay, Bisexual, Transgender/Transsexual, Intersex and Questioning), age, skin colour, language, geographic location, political belief (or lack of), social belief (or lack of), trade union activity (or not), religious belief (or lack of).

**Examples of workplace harassment might include:**

- Offensive, derogatory language or intimidating actions or behaviours;
- Insulting or threatening gestures, language (overt or implied) or continual and unwarranted shouting in the workplace;
- Unjustified and/or unnecessary comments about a person's work or capacity for work;
- Openly displayed pictures, posters, graffiti, written materials, emails or digital media which might be offensive to some;
- Phone calls or messages on voicemails or electronic mail or computer networks which are demeaning, threatening, abusive, humiliating, or offensive to staff;
- Persistent following or stalking within the workplace, or to and from work; and
- The exclusion of a person, or group, from normal conversations, work assignments, workplace updates, information, resources, meetings, work related social activities and networks in the workplace.

**Sexual Harassment:** is a term covering verbal, non-verbal, written or physical conduct which is sexual in nature, is unwelcomed, is unsolicited, is unreciprocated and offends, humiliates or intimidates the person at whom it is aimed. It occurs in circumstances whereby a reasonable person would have anticipated that the person harassed would be offended. It is not about the intent of the person making the comment, gesture or other behavioural element, but rather about the impact on the recipient. It extends from gender harassment through to sexual harassment through to sexual assault.

**Sexual harassment/assault is any type of behaviour or conduct which could take the form of:**

- Gestures;
- The display of offensive material, sexist comments, comments of a sexual nature;
- Posting or sharing pornography, sexual pictures or cartoons, sexually explicit graffiti, or other sexual images (including online);
- Implicit or explicit demands for sexual activity, subtle pressure for sexual favours;
- Outing someone's sexual orientation or gender identity;
- Unwanted kissing, staring, physical contact, touching;
- Stalking;
- Insinuations about a person's private life;
- Repeated and unwanted personal contact, including by text, telephone, Skype, email, or any other form of digital or social media;
- Inappropriate or offensive comments on dress or physical appearance;
- Making repeated comments about someone's physical appearance;
- Gender, gender identity and sexual orientation related insults;
- Workplace pranks which are lewd in nature or reciting lewd jokes, or sharing sexual anecdotes;
- Asking sexual questions, such as questions about someone's sexual history or their sexual orientation.

This list is not exhaustive and definitions of what may be meant by "harassment" or "sexual harassment" may vary based on location and cultural context.

Sexual harassment does not arise in the context of a mutual sexual attraction and/or flirtation based upon choice and consent. Offensive behaviour does not need to be repeated in order to constitute sexual harassment; nor is it limited to one sex harassing the other.

**Bullying:** may be described as repeated and unreasonable behaviour directed toward a person, or a group of people, that creates a risk to health, safety and well-being. Repeated behaviour refers to the persistent nature of the behaviour and refers to a range of behaviours over time. Unreasonable behaviour is behaviour that a reasonable person, having regard to circumstances, may see as unreasonable (in other words, it is an objective test). Bullying hampers productivity by creating dysfunction and damaging morale within working environments. It includes behaviour (generally a pattern of behaviour) that intimidates, offends, degrades or humiliates another person, including by electronic devices including email, blogs, notice boards, social networking sites and websites.

Examples of behaviours that may constitute bullying include, but are not limited to:

- Intimidation;
- Victimisation;
- Verbal abuse or threats, including yelling, screaming, offensive language;
- Excluding or isolating people from workplace activities;
- Assigning impossible tasks or dead-lines, meaningless tasks unrelated to their job, or giving someone the majority of unpleasant tasks;
- Undermining responsibility;
- Withholding information essential to complete a task properly;
- Copying (“Cc”) emails that are critical about someone to others, who do not need to know;
- Using blind copy (“Bcc”) on emails inappropriately;
- Making threats or comments about job security without foundation;
- Changing workplace arrangements (i.e. leave) to inconvenience a particular employee;
- Excessive scrutiny of work;
- Spreading malicious rumours;
- Cyber bullying; or
- Physical, intellectual or emotional abuse.

**Discrimination:** refers to treating a person, or a group of people less favourably than another person or group and can be on the grounds or situations listed below.

Discrimination on the grounds of:

- Gender or Gender identity;
- Sexual orientation;
- Marital status, or pregnancy;
- Family/carer responsibilities;
- Language;
- Race, nationality, ethnicity; skin colour;
- Social origin;
- Level or type of education;
- Religious beliefs (or lack of);
- Health status (dependent on role requirements);

- Disability or impairment;
- Age;
- Trade union activity (or lack of);
- Political or particular belief (or lack of).

It is important that all staff ensure that discrimination does not occur during business activity such as recruitment. The following could be deemed to be discriminatory and are included as examples:

- Failing to hire a job applicant or terminating employment on any of the above grounds;
- Failing to reasonably accommodate reasonable adjustments for job applicants and employees (e.g. with a disability).
- Unfair treatment of an applicant or an employee for a position in the organisation on one of the above listed grounds.
- Following formal or informal policies/practices that deprive people of employment or advancement opportunities or adversely affect employees that possess a protected characteristic.
- Retaliating against an employee who has filed a complaint.
- Treating an employee unfairly or unequally in situations with respect to their compensation.

The above list and examples are not exhaustive and includes actual, potential, alleged, assumed and perceived status.

**What harassment, bullying and discrimination is not:**

Workplace harassment, bullying or discrimination must not be confused with legitimate comments and advice (including negative or constructive feedback or comment) from managers and supervisors on work performance or work-related behaviour of an individual or group.

The process of providing feedback to workers during a formal (or informal) performance appraisal or review, or counselling workers regarding their work performance, will not always be free of stress or tension. Managers should manage these processes with sensitivity and respect; however, they should not avoid their responsibility to provide full, candid and honest feedback to workers.

EHRA secretariat, management and members are responsible for maintaining a working environment free from any form of harassment, bullying and discrimination. EHRA must value and respect the full diversity of our colleagues' experiences and strive for inclusion. EHRA agree to abide by the non-discrimination, non-bullying, anti-harassment policy and Complaint Procedure in the workplace and in relation to all sub-grantees of EHRA.

## 5.2. Roles and Responsibilities

All EHRA Staff and members will:

- Demonstrate compliance to, and support of this, and other EHRA policies and procedures; at all times, by signing a copy of this policy when they join any part of EHRA and, if requested to do so again as part of any refresher training or updated policy release;
- Be aware of the issue of harassment, bullying and discrimination, and the forms it can take and of the damage it can do to individuals and to EHRA;
- Not engage in any types of behaviour which constitute bullying, harassment or discrimination as indicated in this policy;

- Report any potential breaches of this policy to their immediate manager, and using procedures described in the Whistleblowing Policy;
- Comply fully and confidentially with any investigation relating to potential breaches of the policy;
- Contribute to building an environment free from Harassment, Bullying and Discrimination;
- Behave in accordance with EHRA's Purpose, Values and Code of Conduct/Operational Procedures;
- Speak out against harassment, bullying or discrimination if and when witnessed.

The Steering Committee Chairperson shall:

- Escalate proven breaches of this policy to the relevant external authorities as appropriate/deemed necessary and appropriate.
- Establish and support high standards of professional behaviour in the workplace; and
- To ensure that EHRA Executive Director and Senior Management Team take all reasonable steps to monitor, and prevent any form of harassment, bullying and discrimination from arising in the workplace.

EHRA Executive Director shall:

- Establish and support high standards of professional behaviour in the workplace;
- Ensure the workforce is aware and informed of this policy and its application;
- Monitor the workplace and take action to stop discrimination, bullying and harassment immediately if it is observed or reported;
- Encourage staff to report instances and respond promptly, seriously and with respect and sensitivity to every complaint;
- Communicate any changes to this policy to the workforce

### 5.3. Complaint Procedure

In line with the above roles and responsibilities, complainants are encouraged to talk to someone they can trust if they feel they have experienced any form of harassment, bullying or discrimination. This may be a colleague, a line manager, or a friend.

The process of talking through what has happened with someone else can help to determine what action should be taken. EHRA encourages staff to stand up and challenge others when they see wrong doing, and encourage a climate of feedback and accountability. Therefore, where appropriate the complainant should provide direct feedback, to the person causing the problem, making it clear that they find their behaviour towards them unacceptable.

If the above approach does not feel appropriate then the guidance is to raise concerns, confidentially to Line Manager or the Executive Director.

It is important for any complainants to keep a record of the details of any alleged and relevant incidents which cause distress, particularly, if an individual feels unable to talk to the person/people concerned, or if having raised the issue, the issue persists.

If the informal stage, if used, has not resolved the issues, the complainant should communicate their complaint in writing to Line Manager or the Executive Director or follow a [procedure](#) given in the **Whistleblowing Policy**.

## 6. Whistleblowing Policy

This Whistleblowing Policy is intended to encourage and enable employees and others to raise serious concerns internally so that EHRA can address and correct inappropriate conduct and actions. It is the responsibility of all Steering Committee members, the Executive Director, employees and volunteers to report concerns about violations of EHRA's Code of Ethics, Code of Conduct or suspected violations of law or other regulations that govern EHRA's operations.

### No Retaliation

It is contrary to the values of EHRA for anyone to retaliate against any Steering Committee member, Executive Director, employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of EHRA. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

### Accounting and Auditing Matters

The Executive Director shall immediately notify the Steering Committee Chair, and the Treasurer of any concerns or complaint regarding organizational accounting practices, internal controls or auditing and work with them until the matter is resolved.

### Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

### Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

### 6.1. Whistleblowing Reporting Procedure

EHRA has an open-door policy and suggests that employees share their questions, concerns, suggestions or complaints with their direct supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with the Executive Director. Supervisors, Team Leads, managers and advisors are required to report complaints or concerns about suspected ethical and legal violations in writing to the Executive Director, who has the responsibility to investigate all reported complaints. Any employees with concerns or complaints may also submit their concerns in writing directly to their supervisor, the Executive Director or the Steering Committee Chairperson. An employee who is concerned about the actions of a colleague or group of colleagues and suspects that a fraud has been committed or planned should not give the suspect any idea of his suspicions, as this would jeopardise any investigation.

The Executive Director is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved.



An investigation of suspected financial fraud will aim to establish the extent of the fraud, identify the perpetrator, and determine whether other individuals are involved. It will also consider whether a lack of adequate systems and internal controls allowed the fraud to be perpetrated, or whether the problem arose due to a failure to ensure compliance with existing systems.

It is the policy of EHRA to report all cases of suspected fraud to the relevant law enforcement authorities, who may then wish to take the necessary proceedings. In exceptional cases the Executive Director may decide not to report the matter to the police where for example such a report may potentially result in human rights violation due to the political environment in that country. Whether or not the matter is referred to the police, disciplinary action, which may result in dismissal, will be taken against the employee concerned.

An allegation which proves to be unfounded and of malicious intent could be considered an act of gross misconduct on the part of the employee concerned. Disciplinary action, which may result in dismissal, will be taken against any employee making such an allegation.

## 6.2. Handling of Reported Violations

The Executive Director will notify the person who submitted a written complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation of EHRA Ethic Committee.

Contact information for complains:

Ganna Dovbakh, Executive Director, e-mail: [anna@harmreductioneurasia.org](mailto:anna@harmreductioneurasia.org)

Marina Chokheli, Chair of Steering Committee, e- mail: [steeringcommittee@harmreductioneurasia.org](mailto:steeringcommittee@harmreductioneurasia.org)