Peru Support Group Policies

This document is to be given to each employee, made available on the PSG website and made available to anyone with a contractual or other working relationship to the PSG.
These Peru Support Group policies should be reviewed by the management committee at least once a year, as a standard item in the agenda.

Values

Any person representing the PSG must:

1. ensure that their personal and professional conduct is, and is seen to be, of the highest standards.
2. act in good faith and treat other people with dignity and respect, without discrimination, harassment, abuse (including sexual harassment, abuse or misconduct) or neglect.
3. Ensure the commitment of all staff, volunteers and representatives of the PSG to ensure the prevention of any act of sexual abuse and exploitation.
4. take reasonable steps to protect others from harm and to challenge infringements into the rights of others.
5. comply with UK or Peruvian laws as appropriate and show respect for people's culture and traditions.
6. maintain appropriate standards of honesty and integrity in financial accountability.
7. ensure that in all interactions, partners, civil society organisations, individuals and communities engaging with the PSG know what is expected of them as well as what the PSG can offer. PSG representatives must be clear about what the 'information' ('information' includes words, data, images etc) obtained will be used for and how it is handled and distributed.
8. treat with upmost confidentiality sensitive information received from the PSG and all information gathered, for example, when a representative of the PSG carries out field visits.
9. informed consent must be obtained by a representative of the PSG for all interviews, recordings and other information gathering from individuals, communities and civil society organisations. Informed consent forms to be used are to be found at Appendix 1.

Grievances and Complaints

PSG wishes to ensure that its representatives and its outputs through various media are of the highest standard. To this end we wish to be informed of any deviations from these highest standards to put things right and improve our quality and effectiveness.

PSG defines feedback on its performance in three categories of increasing severity:

- **Concern** is an expression of dissatisfaction.
- **Complaint** is a 'concern' that needs further investigation and usually a considered response. It is the need for investigation and a response that makes a complaint distinct from a concern. Complaints may arise from anyone who has dealings with the PSG, either as a member, reader and subscriber, partner, civil society organisation, or any individual who feels that there has been a breach of PSG's commitments to its values.

  Those who raise a concern or allegation about potential or actual serious malpractice carried out by PSG or our representatives (which include safeguarding concerns) will be protected from detrimental treatment in accordance with our commitment to protect whistleblowers when concerns are raised in good faith.
- **Grievance** is a particular, and more serious, form of 'complaint'. A grievance is distinct from a complaint in that it usually describes a complaint made about a violation of employment or other policies of the organisation. Grievance may arise from employed staff, members of PSG, volunteers or consultants who have a significant relationship with the PSG, though not necessarily a contractual one.

Example scenarios of complaints include:

- unwanted, inappropriate or disrespectful sexual advances or harassment.
- bullying, perceived threats, intimidation, favouritism or belittlement.
- hostility to individuals due to race, religion, nationality, gender, sexual orientation, disability or other characteristic protected by law.
- corrupt or biased decisions to include or exclude people and communities.
- inappropriate disclosure of confidential information.
- improper fundraising practices.
- fraud, theft, bribes, any corrupt practices.
- falsification of expenses reports.
- actual or perceived 'conflict of interest' in PSG or partner decision making.
- any other actions that may harm individuals or discredit PSG reputation.
- internal grievance about pay, hours of work, holiday, organisational change, equity and workplace relationships.
- plagiarism in the preparation of documents.
- fairness and/or impartiality in document contents.
- poor or lack of service from the website or email service.
- perceived bias or unfairness in the website/newsletter output.
- compromises to users' personal information.
- poor planning or relations with partners or communities.

Grievances should be raised by writing (physically by a letter or electronically via email – that is in a medium which can be recorded and filed) to an appropriate person in the organisation. The general principle should be that the Grievance be made in the precedence order: Coordinator, member of the management committee, the Chair of the management committee, Vice-President, President. However, because of the circumstances of a particular complaint, one or more of those in the precedence order may need to be omitted.

Complaints should ideally be raised by writing (physically by a letter or electronically via email – that is in a medium which can be recorded and filed) to an appropriate person in the organisation. Where a complaint in a recordable medium is impractical (eg in a visit to an outlying district) then the complaint should be made to a PSG representative and that representative should record the complaint. Similarly, if a complaint is made by someone who does not wish to make a complaint on a recordable medium but only verbally, or who can only make it, for example, by phone, then the complaint should be recorded by the PSG representative. PSG will refer complaints that fall outside the scope of the organisation to the local accompanying organisation or relevant body, should follow up and support be required.

The normal route for complaints should be via the Coordinator, or if that is not appropriate to a member of the management committee. Only in exceptional circumstances should, in the first instance, the Chair of the management committee or the Vice –President be involved.

Sensitive or personal information must be handled in strictest confidence.

Working Practices

Working practices are always subject to the provisions of local law and good practice.

Employees

Particularly for part-time staff, PSG shall be flexible in arrangements for working hours by staff. It will take into account the family situation of staff.

The PSG does not expect staff to work unpaid overtime or to absorb expenses. PSG members and partners must not bully paid staff into undertaking work above that agreed in staff contracts. However, PSG does expect that staff are flexible in their work patterns, for example when weekend conferences are taking place or when visiting Peru. Prior to such exceptional activities PSG and staff will agree what is permissible.

In principle, leave should be taken and not commuted. However, with prior mutual agreement, overtime can be commuted into extra leave and conversely unused leave can be commuted into additional salary.

Recruitment

Requests for sensitive information (eg convictions) must conform to local employment law. Confirmation of the right to work in the relevant country must be checked.

References must be checked.

Volunteer staff

Volunteers should be compensated for their appropriate expenses on production of evidence, normally receipts.

Management committee

Management committee members should be compensated for their appropriate expenses on production of evidence, normally receipts.

Management staff may receive fees for work performed on contracts. On each occasion a formal meeting of the management committee must agree this without any discontents; the Vice President or President must be informed. If the management committee is not in full agreement, the decision must be referred to a meeting of the Vice President and President.

Working with Others

PSG staff, volunteers must be careful interacting with others, particularly when in the field. Safeguarding policies (see below) must be adhered to. When information is being obtained and direct quotes, photographs or footage is recorded then Informed Consent must be obtained from those being interviewed. The Appendix contains Informed Consent procedures.

PSG must be similarly careful when using agents in the course of its work. Often such agents will use policies prescribed by their employers. PSG must check that such policies are as good as or better than PSG's own policies.

Safeguarding

Definitions

A child is a person under the age of 18 years old.

A vulnerable adult is anybody over the age of 18 that has particular care, support, or special needs, or when the person is dependent or reliant on others. Conflict and disasters might also be a cause of some of short terms or long-term vulnerabilities. A vulnerable adult is also whoever identifies themselves as being unable to take care of themselves or to protect themselves from harm/exploitation.

This policy shall cover the use of employed staff, employed consultants and volunteers, including their interactions with others including our partners, communities etc. While a person from a university or another NGO may be employed, such a person may be employed either via the organisation or via a personal contract.

An employee of an organisation will work under norms and procedures established by the organisation and in parallel by the PSG, but if employed on a personal contract such norms and procedures need to be provided solely by the PSG. A similar situation can arise with the use of volunteers.

Only rarely and exceptionally do PSG interact with children or vulnerable people and even then, the norm would be to be accompanied by others. Such occasions include:

- visiting schools or similar establishments: invariably accompanied by a teacher.
- visiting communities in Peru: normally accompanied by a partner.

A particular issue with interactions with communities is that the very act of an NGO, particularly an international one, interacting with communities can increase vulnerability by enflaming tensions within communities or between the community and the state, for example. Similarly, leakage of information (a data protection issue) acquired from the community could increase their vulnerability.

The PSG policy is that when it or its consultants/volunteers make visits, the PSG management committee must consider each such occasion on its merits and make appropriate ad hoc decisions on the way to mitigate risk. Consultants and volunteers are therefore required to provide information on perceived risks and on measures to mitigate them.

Failures in safeguarding must be reported to management and in severe cases may require reporting to outside agencies such as the police. Similarly, failures in safeguarding and their ongoing treatment should be given rapidly, at least in outline, to relevant funders.

Safeguarding issues must be included in any recruitment process, including selection of consultants and volunteers.

Publications

Reporting on events shall be objective. A plurality of views should be represented as appropriate.

PSG reporting is generally derived from secondary or tertiary sources, so great care must be taken on establishing the trustworthiness of such sources. Particularly when a single source reports a striking event with considerable external interest, effort must be taken to find a reputable confirming source. It should be noted that otherwise 'reliable' sources may, on particular issues become biased.

Sources shall be carefully referenced generally via hyperlinks. Where a reference is made to a particular point within a long article, there should be an indication of where in the article the point is being made, ideally including direct quotes.

PSG articles may not use extensive quotes from other sources without permission from the copyright holder.

PSG authors must guard against plagiarism. There is such a danger as PSG uses secondary sources extensively. As already noted proper acknowledgement of sources is one defence. Where sources are not indicated, authors must consider whether what has been written is actually a reproduction in other words of an unacknowledged source.

PSG opinions shall be clearly indicated and not confused with reporting on events.

Information placed on the website or in newsletters, must be checked against the PSG policy by the originator and at least one other on the management committee. In the case of information which is recognised to have some sensitivity, in particular and usually where the PSG gives an opinion, the Chair of the Management committee needs to be consulted. For highly sensitive information the Vice President and President need to be kept in the loop.

Endorsements

PSG is quite frequently asked to endorse publications or submissions to governments, etc generated by other NGOs and sometimes from groupings of which PSG is a part.

PSG should not endorse publications the details of which it knows little, even if the publication supports general themes of which the PSG is in favour (e.g. support for the marginalised groups or people).

An agreement to endorse must, other than in exceptional circumstance, be agreed at a meeting including at least three members of the Management Committee. Where such an endorsement is sensitive, the Vice President and President should be in the loop.

Data Protection

Principles

Most information that the PSG uses is from publicly available sources and does not need to be kept securely. However, there is a limited amount of data that does need to be handled with sensitivity and securely, in particular all personal data and information given in confidence. Sensitive information should be diffused only to those who 'need to know'. For such data, PSG abides by the principles which relate to Data Protection under the Data Protection Act 2018 and associated GDPR, namely:

- data must be obtained and processed fairly and lawfully.
- data must be held for lawful purposes.
- data must be adequate, relevant and not excessive.
- data should be accurate and kept up to date.
- data should not be kept longer than is necessary. However, it should be noted that funders, HMRC etc consider financial data be kept for seven years.
- Potentially out-of-date (normally more than five years) personal data should not be used without a check with the person concerned.

- data should be processed in accordance with the rights of data subjects under this Act.
- data must be kept secure. PSG abides by the guidance provided by the Information Commissioner's Office in relation to managing and reporting any security breach.
- data generated in UK or Peru must only be transferred from these countries according to the current laws in place in each.

Individuals are entitled to know what data PSG holds about them and the PSG must provide reasonable access when asked.

Nature of data to be protected

Personal data held by PSG are basically of four kinds:

- Personal data on employees and potential employees, such as contracts, or staff reports.
- Data on communities and people with whom PSG interacts in the UK, Peru and elsewhere.
- Information on members used to establish membership lists, distribution of information on the organisation or voting processes etc.
- Address and email lists used by the bulk email and newsletter distribution system

There is a fifth type, probably the most important, which gives indirect access to personal data:

- PSG management documents, which contain information such as passwords, that allow access to databases.

PSG does not have a physical office, so all information is held on paper or electronic form (documents, spreadsheets etc) at the homes of the Coordinator, Management Committee members.

Means of protection

Where services are bought in (e.g. distribution of bulk emails), PSG relies on the service providers for the integrity of the services they provide. The means of access to such services (e.g. passwords) shall be controlled and limited to those with a need-to-know.

PSG relies on good practices of its management, employees and volunteers:

- Computers should be under the control of such people. If computers are shared, then PSG data should be held on a dedicated memory stick.
- Paperwork should be held separate from other activities in the home, and sensitive data must be held in a secure fashion.

Finance

The PSG shall have a system of accounting. The system shall have provisions:

- for recording and categorising items of income and expenditure.
- to keep track of projects whether internal projects or those for which PSG has received a contract.
- to produce reports (e.g. of income/expenditure, transactions etc) for its own and project accounts.

It shall preserve financial data for at least seven years.

Currently:

- The accounting is cash based, with a few accruals where it improves the reporting (e.g. if grants for a financial year are received a few days before the start of the financial year).
- GnuCash is currently used as the basis of its accounting system. For many years before 2021 Microsoft Money was used.

Project accounts and project reporting can be maintained by, for example, a system of spreadsheets running in parallel with the PSG internal accounting system noted above. The sophistication of such a system shall be appropriate to the complexity of the project and the needs of the contracting

customer.

PSG accounts (in particular those for the Annual Report) shall be signed off by the Treasurer. Project accounts, for release to the contracting customer, shall be signed off by the Treasurer.

PSG accounts and its accounting system should be examined yearly by an independent examiner, but a formal audit is not a requirement.

Expenses shall in general be reimbursed only on production of receipts or other documentary evidence e.g. credit card accounts.

Fraud and Loss

Introduction

A small organisation like PSG could still have fraud issues. It can still lose resources of money or devices. Any fraud could also have serious consequence in trust lost with our members, our funders and more generally. Therefore, fraud does need to be taken seriously and all cases will be investigated, reported on and action taken.

Definition of fraud

Likely possible areas of fraud include:

- abstraction of money
- loss or improper use of resources, such as equipment, software
- improper recording of time on PSG activities
- improper recording of expenses
- corrupt buying of goods or services
  - from family, friends etc
  - in the expectation of a kick-back
  - of higher standard and cost than necessary (e.g. of tickets, accommodation)
- lack of due care in awarding contracts or in buying goods or services, so that best value for money is not obtained, for example by:
  - failing to get multiple quotes

Prevention of fraud

Normally all claims for expenses should be accompanied by some sort of transaction record: an invoice/receipt, credit/debit card entry.

Reporting and investigation of fraud

Suspected fraud should be reported in writing to a member of the management committee (normally the Chair) and the Vice President. Normally these two should undertake the investigation of the suspected fraud.

Records of the investigation and outcome for each suspected or actual fraud shall be preserved

Annex 1: Informed Consent

This consent procedure is derived from that used by CAFOD. PSG thanks CAFOD for its help.

Written consent form – interviews, photos and film

Peru Support Group (PSG), would like to collect quotes, photographs or footage of you to help raise the profile of PSG's work. Please tick the boxes if we may use your interview, photo or video for:

Purpose	Detail	Tick to consent
Publicity within PSG	Shared on PSG's, emails.	
In PSG publications and materials	Published in PSG's leaflets, posters and magazines and included in emails to PSG supporters.	
In PSG publications	Published on PSG's website and social media channels, used in PSG press releases and in print, broadcast and online media in the UK and internationally.	
In publications and materials for PSG's sister organisations and donors	Published in any leaflets, posters, magazines, websites, social media, news media for PSG sister organisations (eg PEP) or funders (eg CAFOD).	

Note to interviewer – if consent is not given to all channels, consider whether you can guarantee the safety of the individual and ensure their preferred use of their image/story. Your content may not be usable unless full consent is given, so consider whether you want to proceed with the interview/photography/filming.

PSG produces materials based on principles of dignity, respect and truth.

To protect the identities of people who may be talking about sensitive or controversial topics, we can use a pseudonym instead of your real name – please let us know if this applies to you.

I have read and understood how you expect to use quotes, photographs and video footage, and am happy for you to do so.

Date: _ ___ _

Name: _

Signature: _

Name and signature of PSG representative receiving authorisation: _

_ _

<u>If child is 17 or under, please also complete:</u>

Name of parent/guardian/person with responsibility: _

Signature: _

You can withdraw your consent at any time. If you have any concerns, contact PSG at *coordinator@perusupportgroup.org.uk*

Email your completed form, marked as confidential, to coordinator@perusupportgroup.org.uk

Verbal consent form for interviews, photos and film

Key points

- Written consent is best practice, as well as legally required in many situations, and should be obtained whenever possible. The template form for written consent is available above.
- Verbal consent or preferably written consent must be obtained for all interviews, photos and videos – regardless of location or age.
- Written consent for people under the age of 18 by their parent or guardian must be captured whenever possible.
- People should not feel obliged to take part. We/the partner should not put pressure on anyone.
- If capturing interviews, photos and/or film while overseas, ask PSG staff or partner staff for guidance on obtaining consent, particularly for young people.

How to get verbal consent

Where verbal consent is given from adults or children, it should be given both before and after the interview, photography, or filming.

1) Explain to the person what their story and image will be used for and where. Show them examples of PSG materials and explain that publication will primarily be for supporters in the UK.
   - Explain that their story may be used in PSG's materials such as leaflets or magazines.
   - It may be used on PSG's website, which has the potential for distribution around the world, including their own country.
   - It may be used for external publicity such as newspapers, TV, radio and online media.

   If they only want to give consent for certain channels, this must be recorded alongside the interview/footage. Images and biographical information should only be used for the purposes for which consent has been obtained. So if they don't consent to all channels, you may choose not to interview them.
2) Consider the safety and security of the individual, their family and community when capturing their story for further use. Offer to use pseudonyms if needed.
3) Ask if they are comfortable telling you their story, having photographs taken and are happy for you to share their story in this way.
4) Ask if they have any questions.

Additional advice for children 17 or under

- Where interviews or footage are to be taken of children, where possible they and their parents/guardians should be prepared in advance and told where information, quotes and images may be used.
- If a child is younger than 16 years old, consent must be gained from a parent or guardian (this may be through a partner organisation when working overseas) regarding the publication of images. In addition, consent should also be obtained from the child where they are considered old enough.
- In some countries, parental consent is required for older children – please check with the programme and/or partner staff about local regulations.
- Consent can be written or verbal; adapt communications methods according to the needs of the child and parent/guardia

VERBAL CONSENT FORM – to be filled in by PSG representative	
Name of interviewee: _	Age: _ _ _ _ _
Date: _	Verbal consent given: Yes / No
Name of PSG representative receiving authorisation: _	

Annex 2: Staff and representatives of PSG abides by code of conduct signature.

Every staff, volunteer and representative of the PSG must read the policies for conducting our work and sign the form below, stating they have understood and abide by these principles.

Written record of acknowledgement – PSG policies
I have read and understood the policies contained in this document and endorse them.

Name:

Signature:

Date: