

## PEACEWAVES INTERNATIONAL NETWORK ONLUS CODE OF ETHICS

PeaceWaves International Network ONLUS, in this document from now on called PeaceWaves, is committed to being transparent in its work and accountable to its key stakeholders, in particular people living in poverty, in condition of social hardships and vulnerability. We share information with people living in poverty and partner organisations, and are also accountable to our staff, volunteers, supporters, donors, suppliers and host governments. An important aspect of this is how we respond to requests for information. We will disclose information, or give reasons for any decision not to disclose (for example, to respect confidentiality or privacy). Our key criterion for the decision will be the impact on our mission, to overcome poverty, suffering and social vulnerability.

The present Code of Ethics refers to PeaceWaves ONLUS statute and respects the Italian Constitution and all the laws deriving from it, in particular regulations regarding privacy and personal data treatment (Decreto legislativo 30 giugno 2003, n. 196, named Codice in materia di protezione dei dati personali or also known as "Testo unico sulla privacy"). Moreover, PeaceWaves identifies with the European Charter of Fundamental Rights and the relatives conventions as well as the Universal Declaration of Human Rights and the UN Conventions.

All PeaceWaves members, managers, employees, partners, volunteers, consultants, advisors and stakeholders, must conform to the present Code of Ethics in their conduct and behaviours.

The Administrative Board of PeaceWaves has the duty to evaluate programs, projects, actions and any activity regarding PeaceWaves and its members, respecting the above Code of Ethics. For any possible doubt, controversy, and request from individual members and stakeholders an Ethics Committee will be involved for the issue resolution.

In particular, this Code of Ethics is aimed to safeguard all those activities that involve the following direct beneficiaries when they are exposed to a specifically high risk and complexity: persons under 18, elderly, disables, asylum seekers, extra-communitarian immigrants, ex prisoners, former drug-addicted persons, abused and exploited women.

In those activities where direct beneficiaries and participants have to give their consent about complex issues, PeaceWaves makes sure that enough information and time are provided to enhance and guarantee reflection and awareness. The Administrative Board of PeaceWaves, before promoting any initiative, goes through a process of risk evaluation.

### **Composition and role of the Ethics Committee**

The Administrative Board nominates, for every mandate, an Ethics Committee composed of:

- five external members, chosen: one from Senior Academic staff to cover the ethical aspects (from several different Italian Universities), one judge (to cover the legal and law aspects), one expert of no profit finances and economy, one psychologist expert in crisis and emergency and one expert in education and project management;
- two internal members of PeaceWaves: one legal advisor nominated by the Administration Board, one nominated by the Members' General Assembly.

The Ethics Committee has a duty of confidentiality and makes sure that every project and action of PeaceWaves is in accordance to the present Code of Ethics and has also the duty to revise and possibly adjust the present Code of Ethics. The Ethics Committee has also the duty to monitor the projects of PeaceWaves and to write an annual report on the whole activity of the Association.

In case of conflicts of interests where one of the above members is involved they are required to withdraw from the Ethics Committee.

## General scope

The code covers:

- all projects, actions, researches and training in which PeaceWaves is involved both as main responsible and as a partner;
- all methodologies and tools applied by PeaceWaves;
- actions of individual members of PeaceWaves, when they work as representative of the Association;
- all the persons, including the stakeholders, who are involved in PeaceWaves actions;
- all the data and information collected by PeaceWaves, managed as illustrated in the Code of Ethics;
- all the information disclosed and disseminated by PeaceWaves through the official website ([www.peacewaves.org](http://www.peacewaves.org)), publications, video materials, interviews, articles in newspapers and magazines, conferences and public events (exhibitions, performances and concerts).
- This policy is subject to Italy and European Union data protection and privacy legislation. Accordingly, we will not disclose data about living individuals where this is prohibited under applicable law. If we do not disclose information, we will give reasons for not disclosing. The most frequent reasons are:

*Security:* The safety of our staff is a primary concern. We will not disclose information where we consider it could jeopardise our ability to operate or the safety of our staff and that of our partners.

*Privacy:* Some information are by their nature private to the individuals concerned.

*Confidential information:* Information may be confidential because of legal, commercial or contractual reasons, or because their premature disclosure would jeopardise action that PeaceWaves is planning to take.

*Copyright limitations:* In some cases we do not have the right to disclose information because it is someone else's copyright, and while we have the right to make internal use of it, this does not extend to publishing it. We do favour open publishing where we can, such as for our policy papers.

*Cost:* Where we consider that the cost of disclosure, whether as a time cost or a monetary cost, would be disproportionate to the request, we may decline disclosure; however we will specify this was the reason of the refusal.

*Detailed information about programmes:* Our project officers' priority in information is providing information to our partners and the people for whom we work. We may decline to provide information to requests made in Italy about our international programme work in other countries where this would take up significant staff time in our programme.

*Internal planning, drafts and trivial or ephemeral information:* We will generally not disclose internal working papers that address future plans, or drafts of work, or information which we consider is of ephemeral interest such that the work involved in disclosure is in our view disproportionate.

*Harm to operations:* We recognise the importance of how we put principles into practice. But there will be occasions where we do not disclose information because we consider that the disclosure could harm our work, whether in Italy or in our international operations. An example would be information about a campaign involving particular targets, where the disclosure could jeopardise the effectiveness of the campaign.

## Ethics and the law

The law reflected in this code of practice is the law of Italy. However, when a project is carried out in other countries than Italy, the applicable law becomes that one of that place or places.

All the projects and actions carried out by PeaceWaves must follow this code, and in any ambiguous case it is necessary the approval of the Ethic Committee. All the projects and the members of

PeaceWaves must protect participants and potential participants from any damage and guarantee their dignity, rights, bodily integrity, privacy, confidentiality and person properties.

PeaceWaves protects from physical and mental risks all the participants in its projects. PeaceWaves operates under an ethos and policy of transparency and openness.

Insurance covers all the projects and activities of PeaceWaves. In those case where there is any forms of ambiguity, the insurance cover starts only after the approval of the Ethic Committee.

### **Financial Transactions / Records and Reports**

- All financial transactions must be accounted for accurately and properly. No undisclosed or unrecorded funds or assets may be established or maintained for any purpose.
- Payments/cash transactions must be made only into Headquarters-approved bank accounts.
- No borrowings may be made from local lending institutions or individuals without prior written approval of the PeaceWaves President and Treasurer responsible for Finance and Administration.
- Financial data required to be submitted to donors, including governments, must be accurate, complete, current and in accordance with contractual/grant requirements.
- Other than travel advances, personal loans or personal advances may not be made to staff or consultants under any circumstances without the prior written approval of the Treasurer for Finance and Administration. Travel advances are to be accounted for and documented within 30 days of execution. Requests for compensation advances where staff business travel prohibits the normal receipt of such funds require two levels of written supervisory approval.

### **Gifts and Gratuities**

- No political parties' contributions may be made from PeaceWaves funds in Italy or in any other country, even in locations where such contributions are legal.
- No payments may be made to any government official, candidate for a political office, any political party or official thereof, or to any other person or entity where the person making the payment knows or has reason to believe that the recipient will pass some or all of the payment to a prohibited person for the purpose of obtaining or retaining business. Notwithstanding the foregoing, expediting fees, processing fees and payments to brokers or middlemen, paid in the usual course of business which are not illegal and are in line with prevailing rates and practices for similar transactions in the locale, are allowed to secure goods and services for PeaceWaves.
- Gratuities, business entertainment, meals and gifts which are lawful, customary and reasonable in amount are permissible using PeaceWaves funds. However, no payments, gratuities or gifts will be made, directly or indirectly, to any official or employee of the Italian government or any other government or government agency that exceed €100.00 (or equivalent in local currency).
- No employee or member of his or her family may solicit or accept, directly or indirectly, any gift, entertainment or favour from an actual or potential supplier of PeaceWaves except for promotional-type gifts with a retail value under € 100 (or equivalent in local currency), and entertainment, meals and social invitations that are in keeping with good business ethics that obligate neither the recipient nor PeaceWaves. This includes the payment of commercial transportation, hotel room or other living and travelling expenses, except when travel and participation is part of a group hosted by a supplier or customer representative, the activity is business-related, and the activity is promptly reported to the employee's supervisor and next level supervisor.

### **Conflicts of Interest**

A conflict of interest is any circumstance that would cast doubt on any member's ability to act with total objectivity with regard to PeaceWaves' interest, where as member it is intended any volunteer, employee, manager, etc. PeaceWaves seeks to avoid the appearance of, as well as any actual, conflict of interest. Members in doubt about a potential conflict should speak with the Administration Board, in particular with the staff manager. The following are examples of conflicts of interest:

- No member or family member may have, directly or indirectly, a significant financial interest in, involvement with, or obligation to any business organization which does or seeks to do business with PeaceWaves unless the interest or obligation has been fully disclosed in writing to the Administration Board, and it has been determined that the member's duties for PeaceWaves will not require him or her to make decisions or take actions that could be influenced by such interest, involvement or obligation.
- No member may engage in an independent business venture or perform work or services for another organization to the extent that the activity prevents the member from devoting the time and effort to the business of PeaceWaves as required by his or her position.
- No member may appropriate or divert a business opportunity of PeaceWaves to any other person or organization.
- No member may participate in a decision-making process involving circumstances that present a conflict of interest. This includes employment-related decisions regarding a family member or other person with whom the member has a close personal relationship.

### **Beneficiary Safety and Protection**

- Sexual exploitation and abuse by members constitute acts of gross misconduct and are therefore grounds for termination of employment.
- Sexual activity with children (persons under the age of 18) is prohibited regardless of the local age of majority or age of consent. Mistaken belief in the age of a child is not a defence. The sole exception in applying this principle may be in the instance where an employee is legally married to someone under the age of eighteen.
- Exchange of money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour, is prohibited. This includes exchange of assistance that is due to beneficiaries.
- Sexual relationships between members and beneficiaries are strongly discouraged since they are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of humanitarian aid work.
- Where a member develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether employed by PeaceWaves or not, s/he must report such concerns via established PeaceWaves reporting mechanisms (Administration Board and staff manager).
- Members are obliged to create and maintain an environment that prevents sexual exploitation and abuse and promotes the implementation of this Code of Conduct. Managers at all levels have particular responsibilities to support and develop systems that maintain this environment.

### **Confidential and Proprietary Information**

PeaceWaves possesses information that has been created, discovered and developed by the Association, or has been disclosed to the Association under the obligation of confidentiality. Such information ("Confidential and Proprietary Information") includes donor lists, information concerning beneficiaries and programming, financial statements, projections, marketing or programmatic plans or strategies, software and computer programs, art work and photography. PeaceWaves members having access to Confidential and Proprietary Information are required, during and after employment with the Association, to keep all such Confidential and Proprietary Information in strictest confidence. Nothing contained in this paragraph is intended to prevent any member from utilizing his or her general knowledge, intellect, experience and skills for gainful employment after termination of employment with the Association.

All information and materials are stored in PeaceWaves headquarter in a specific safe. These materials will be kept for at least 5 years and after this time, according to the Ethic Committee's opinion, the Administrative Board can destroy them.

### **Reporting a Possible Violation**

Any person who is aware of a possible violation of this policy has the right and responsibility and is strongly encouraged to report such violation so that PeaceWaves can respond rapidly and take appropriate action, through the Administrative Board and the staff manager. In cases where the Administrative Board or the staff manager re the member involved in the violation, the person aware of it should refer directly to the Ethics Committee.

## **1. Collection of data and how information we hold about you can be used**

As you explore our website, you will come across places in which we ask you to provide us with information about yourself. We explain each of these below. We will not use your name or email address for any purpose other than as stated.

**1.1** On the beneficiary part of this site, we will require personal information from you such as your name, billing address, email address, contact telephone number, payment card information for the purpose of processing and fulfilling your offer or buying of videos and materials produced by PeaceWaves. We will collect, hold and process that information including passing such elements of this information on to third parties, who may be within the PeaceWaves or an agent acting on our behalf, as is necessary for that purpose. We will require that any such third party must process your personal information in accordance with this Privacy Policy and in accordance with the Decreto legislativo 30 giugno 2003, n. 196. We will also retain information relating to your sales history so that you can check your own order history in the My Account section and for the purpose of marketing research. By ordering Goods from us, you are agreeing that PeaceWaves may use the information you provide to us and information about your account for marketing purposes. This will include sending you marketing and newsletter by email if you have indicated in the My Account section that you wish to receive email marketing and newsletter from us. This information will not be shared with other companies.

**1.2** In some places in this site, we ask for your feedback, opinion or suggestions, and provide you with a link for emailing us your response. But again we will only use the email address we receive from you for the purpose of responding to your questions or suggestions.

**1.3** On occasion, we seek to gather a broader profile of some of the visitors to sections of this site (e.g. through surveys or competitions). The information that we request, may be provided to our editorial, marketing or publicity departments. It may also be shared with our content providers, such as authors, advertisers or other publishers, to provide them with demographic information about the visitors to our site.

**1.4** All the information we received regarding the recruitment of members and volunteers (such as CVs) are treated and used by our staff office only for the mentioned purpose. Moreover, whether you want that our site publishes your CV, we do it in the specific section of our site.

**1.5** An additional area in which we ask for your name is on newsletter or forums – places on the site where you can participate in a discussion of a particular subject by posting written comments which are then entirely public. You must register your details in order to do so. Registration information will not be disclosed and is for security purposes. You should be aware that if you do disclose personal information on newsletter or forums, that information can be collected and used by others and may result in unsolicited messages from third parties. By participating in these forums, you should remember that you are legally liable for the material you post, including libel and copyright infringement.

## **2. Storage, correction and disclosure of personal data**

**2.1** We will retain the data we hold concerning you for as long as it is necessary to do so. We will retain and disclose personal data to authorised authorities without your consent where we are required to do so under the law.

## **3. Removing Your email address**

**3.1** All of our email newsletters include instructions on how to unsubscribe. Please follow these instructions to remove yourself from our individual lists. If you have previously provided us with your email address or any other information and later decide that you do not want us to have it, please update your details in the My Account section.

## **4. Cookies**

**4.1** Cookies are electronic tags that most websites place on your computer in the process of sending your computer a file, such as a web page. We use them as well. A cookie can tell us when a computer that has previously visited our site returns, and what pages it requests on each of its visits. Cookies help us keep track of how our visitors (or more accurately, their computers) use our site, including such things as the type of browser they use, the frequency of their visits and the pages that are most popular. They can help smooth your travel through our site by keeping track of information that has already been provided by your computer so that you do not need to re-enter it. In no event does the cookie we place

on your computer tell us anything about your visits to other websites (except those you enter through a link on our site), or your use of the internet in any other way. If you would still prefer not to receive any cookies, most browsers can be set to refuse cookies or to alert you when one is being sent. However, some portions of this site may not function properly if the cookies are disabled.

## **5. Links to other sites**

**5.1** Our site contains links to other sites that are not under our control, even though they may use the PeaceWaves name or logo on their site through an agreement with us. Such other sites do not necessarily follow our privacy policies, and may place their own cookies on your computer. This practice is standard on the Web. We do not control cookies placed on your computer by third parties whose advertising or links appear on our site.

## **6. Security of private information**

**6.1** No data transmission over the internet can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, PeaceWaves cannot ensure or warrant the security of any information you transmit to us, and you do so at your own risk. Once we receive your transmission, we make our best effort to ensure its security on our systems and we take reasonable steps to protect the information you provide us from theft, alteration or unauthorized inspection.

## **7. Parents and guardians and users under 18**

**7.1** We encourage you to get involved with your children's online usage and to be aware of the activities in which they are participating. We also ask you to check back here regularly to see what our latest policies are, particularly those relating to children. You should be aware that if your children voluntarily disclose their names, email addresses or other information on bulletin boards or chat areas of other websites, such disclosures may result in unsolicited messages from other parties. We suggest that you discourage your child from providing such information on this site or elsewhere unless you are confident that the information will not be misused.

**7.2** Users under 18: If you are under 18, please make sure that you obtain your parent/guardian's permission beforehand whenever you provide personal information to PeaceWaves 's website. Users without this consent are not allowed to provide us with personal information. Also, if you do use this site for information about fundraising or supporting the work of PeaceWaves please let an adult know.

Read, approved and signed by the Members Meeting

Ratified by the Board of Directors

Turin, May 17th 2007