WADDAN

PARTNER IN DEVELOPMENT

Our Policies

Public summaries of WADDAN's institutional policies

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About this document

WADDAN – Partner in Development is a non-profit development organization working in Pakistan. Its work is governed by a Board-approved Institutional Management System and a suite of policies. This document summarizes the main policies that donors, partners, communities and the public most often ask about. Each summary states what the policy is for and what WADDAN commits to.

AT A GLANCE

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POLICY SUMMARIES	POLICY AREAS	CODE OF CONDUCT

This is a public summary. It describes WADDAN's commitments and general approach; it does not reproduce internal procedures, approval limits, security arrangements or contact points that WADDAN keeps for internal use.

Contact

For general enquiries, please visit the Contact page of the WADDAN website: www.waddan.org/contact
To raise a complaint or safeguarding concern, please visit: www.waddan.org/complaints

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1. Governance, Integrity & Compliance

01 Anti-Fraud, Anti-Corruption & Whistleblower Protection Policy

WADDAN has zero tolerance for fraud, corruption, bribery, kickbacks and misappropriation by anyone connected with its work. The policy lists prohibited conduct, requires annual signed anti-fraud and conflict-of-interest declarations, and sets financial and procurement integrity controls. Anyone may report a concern, anonymously if they wish, with direct access to the Board Chair where senior management is involved. Reports are acknowledged within 72 hours and investigated by people independent of the matter. Retaliation against a person who reports in good faith is gross misconduct, and substantiated cases can lead to disciplinary action, legal referral, donor notification and recovery of funds.

02 AML/CFT & Anti-Terrorism / Sanctions Compliance Policy

WADDAN complies strictly with anti-money-laundering, counter-terrorism-financing and sanctions requirements. New donors, vendors, sub-grant partners and Board members are screened against the UN Security Council, EU, OFAC and Pakistan NACTA lists, with enhanced due diligence for higher-risk transactions. Funds move through regulated banks, and hawala and other informal transfers are prohibited. Unusual transactions are reported internally, and any positive sanctions match is escalated to the CEO and the Director Legal & Governance and is never overridden at a lower level.

03 Enterprise Risk Management & Internal Audit Policy

WADDAN manages risk under a Board-approved policy. The Board has a low appetite for safeguarding failures, fraud, regulatory non-compliance and reputational harm. Risks are rated, assigned to named owners and recorded in a regularly reviewed Risk Register, and the most serious risks are escalated promptly to the CEO and the Board. Internal audit is independent of management, has unrestricted access to records, staff and sites, reports to the Board's Finance & Audit Committee, and audit findings must be corrected within fixed timelines.

04 Human Rights Policy

WADDAN commits to a human rights-based approach and to the UN Guiding Principles on Business and Human Rights: protect, respect and remedy. Every project design identifies rights-holders and duty-bearers, and a human rights impact assessment is completed before implementation. Partners are assessed for human rights risks. The Director Legal & Governance carries out an annual human rights review for the Board's Risk & Compliance Committee. Anyone who believes their rights may be affected can raise a concern through the community grievance, safeguarding, whistleblower or anti-harassment channels and receive an effective remedy without fear of retaliation.

05 Procurement Policy

WADDAN buys goods, works and services openly, competitively and for value for money. The person who initiates a purchase, the people who evaluate it and the person who approves it must be different, and kickbacks, collusion and bid-rigging are not tolerated. The method of purchase rises with the value of the requirement, from direct purchase to open tender. Vendors are registered and checked before award, higher-value vendors are screened against sanctions lists, and assets are tagged and verified each year. Where a donor sets stricter rules, those rules apply. Local and women-led suppliers are preferred where quality and price are competitive.

2. Safeguarding & Protection

06 Safeguarding, PSEA & Child Protection Policy

WADDAN has zero tolerance for sexual exploitation and abuse, harassment, child abuse and trafficking by anyone connected with its work. Everyone engaged by WADDAN is vetted before deployment, signs the Code of Conduct, completes safeguarding induction and annual refresher training, and follows the two-adult rule when working with children. Concerns can be raised through a female Safeguarding Focal Person, a confidential email address, or directly to the Board Chair when senior management is involved. Every report is handled in a survivor-centred way: it is logged and acknowledged within 24 hours, survivor safety is assessed, an independent gender-balanced committee investigates, and decisions and lessons are recorded. Donors are informed of serious cases as their agreements require. Anyone who reports in good faith is protected from retaliation.

07 Safeguarding Code of Conduct

The Code sets out the behaviour expected of every Board member, staff member, consultant, volunteer, intern and community mobilizer, and must be signed before work begins. The full public version of the Code is at the end of this document.

08 Child Labour Prohibition Policy

WADDAN has zero tolerance for child labour in its own operations, its supply chain and its partners' work. No person under 18 may be employed or used in harmful or exploitative work, and age is verified from an original document. Procurement contracts carry a child-labour prohibition clause and vendors must declare a child-labour-free supply chain to be registered. Where child labour is confirmed, contracts are suspended pending remediation, and the child is supported to leave the work safely rather than simply dismissed. Suspicions are reported to the Safeguarding Focal Person, and programmes link livelihood support with school enrolment.

09 Modern Slavery, Forced Labour & Human Trafficking Policy

WADDAN prohibits forced, bonded and compulsory labour, deceptive recruitment, withholding of identity documents, recruitment fees and trafficking in its operations, programmes, supply chains and partnerships. Job offers state the role, location, conditions and pay truthfully and in writing, no fee is ever taken from staff or volunteers, and original identity documents are never kept. Modern-slavery risk is assessed in partner and vendor due diligence and staff are trained to recognize indicators. Suspected cases are reported to the Safeguarding Focal Person and investigated, and confirmed cases are referred to law enforcement with the survivor's informed consent and safety in mind.

10 Safeguarding Partner Compliance Policy

WADDAN remains accountable to donors and communities for safeguarding and does not delegate that responsibility to partners. Before any agreement, a partner must have an approved safeguarding/PSEA policy, a signed Code of Conduct, a named female Safeguarding Focal Point, training before community deployment, an accessible complaint mechanism, non-retaliation protection and a commitment to notify WADDAN of any incident within 24 hours. No funds are released until these checks are complete, and safeguarding is reviewed during monitoring visits and in an annual assessment. Partners with serious failures are reported to the authorities and removed from the partner register.

11 Anti-Harassment & Misconduct Investigation Policy

Everyone working with WADDAN has the right to a respectful, harassment-free workplace in offices, field sites, events and online. The policy defines sexual harassment, bullying, discrimination, victimization, psychological abuse and cyber harassment, and provides confidential and anonymous reporting channels, including a female Safeguarding Focal Person for sexual harassment. Complaints are investigated by an independent, gender-balanced committee. The person complained about receives written notice of the allegations and a fair chance to reply, findings are made on the balance of probabilities with reasons, and decisions can be appealed. Retaliation against a complainant or witness is gross misconduct.

12 Digital Safeguarding Policy

WADDAN protects beneficiaries, children and staff from harm through digital technology, including online grooming, data exploitation, identity exposure, cyber harassment, image exploitation and disinformation. Staff do not contact beneficiaries through personal accounts, WhatsApp or social media; contact goes through organizational channels with dual oversight. Written informed consent is needed before any photo, video, recording or story, and facial recognition, geolocation and biometric data are collected only with explicit consent and senior authorization. Digital safeguarding incidents are reported to the Safeguarding Focal Person within 24 hours and investigated to the same standard as any other case.

3. Gender, Diversity & Inclusion

13 Gender Equality & Inclusion Policy

Gender equality is central to WADDAN's mission. The policy sets minimum female representation targets for the Board, Advisory Board and staff, and three firm controls: at least one woman on every interview panel, a female focal point at every project site, and explicit gender activity budget lines in every project budget. Gender is mainstreamed through all phases of the project cycle with gender analysis and disaggregated data. The policy guarantees equal pay for equal work, paid maternity leave of at least 90 days, safe field arrangements for women, and referral of any report of gender-based violence to the Safeguarding Focal Person.

14 Diversity, Equity & Inclusion Policy

Diversity, equity and inclusion are core institutional values in WADDAN's recruitment, leadership, programming and culture. Commitments cover gender, language and ethnicity, geography (active recruitment from the Merged Districts and rural Khyber Pakhtunkhwa), disability, age and religion. Targets include at least 40% women at all levels (with 50% as the aspiration), 5% of staff who are persons with disabilities by 2028, and at least 25% of staff under 35. WADDAN analyses pay equity each year, provides DEI training, runs an anonymous annual inclusion survey and protects anyone who raises a concern from retaliation.

15 Disability Inclusion Policy

WADDAN follows the social model of disability: barriers in society, not impairment, disable people, and persons with disabilities are rights-holders, not passive beneficiaries. Every programme is screened for disability inclusion at design, with barriers and the measures and budget to remove them recorded before approval. Beneficiary data is disaggregated using the Washington Group Short Set, offices and venues are assessed for accessibility, information is provided in accessible formats, and complaint channels have no literacy or mobility barrier. In employment, reasonable adjustments are provided. Disability data is sensitive and is collected only with specific written consent.

4. Programmes, Partnerships & Accountability

16 Accountability to Affected Populations Policy

Communities are at the centre of WADDAN's programmes. Its commitments are leadership and governance, transparency, feedback and complaints, participation, and programme design informed by feedback. Before activities start, communities are told the objectives, eligibility, timelines and how to complain. A Grievance Redress Mechanism operates at every project site, with in-person and email options in Pashto, Urdu and English. Every complaint is acknowledged within 5 days and resolved or escalated within 30 days, anonymous complaints are always accepted, and women, children, persons with disabilities and marginalized groups have tailored channels. Safeguarding concerns go directly to the Safeguarding Focal Person.

17 Program Management, MEL & Learning Policy

WADDAN manages every programme through one institutional framework and an eight-phase project cycle, with controls to be met before moving from one phase to the next. Projects use a results chain from inputs to impact and indicators disaggregated by gender, age, disability and geography. Data must be accurate, complete, timely, consistent and verifiable, and unverified figures are never reported as results. The policy sets out regular reporting from field reports to an Annual Impact Report, mid-term and end-line evaluations, community feedback, a learning system and responsible use of AI.

18 Research Ethics Policy

Research, evaluation and surveys involving people must meet international ethics standards and must not harm, exploit or endanger participants. The policy rests on respect for persons, doing no harm, justice and confidentiality. Research involving children, survivors of violence, displaced persons, persons with disabilities or sensitive health or identity data needs formal ethics review before it starts. Participants give voluntary informed consent in their own language and may withdraw at any time, children take part only with a parent's or guardian's consent, data is anonymized, and findings are shared with communities before publication.

19 Resource Mobilization & Fundraising Policy

WADDAN raises funds ethically, transparently and in line with its mission: it does not enter a partnership for funding alone and does not accept funding that conflicts with its mission, neutrality or values. Every prospective donor is screened (sanctions, mission alignment, political independence, conditions attached and source of funds) before engagement, the CEO decides whether to pursue each opportunity, and proposals go through gender, risk, environmental, finance and legal review. WADDAN obtains the Economic Affairs Division No-Objection Certificate before receiving international funding.

20 Localization Policy

WADDAN commits to shifting power, funding and decision-making to local and national actors, with a target that at least 60% of sub-granted funds go to local community-based organizations and local NGOs by 2028. Local partners are treated as equal partners, not subcontractors; capacity support is an investment and never a condition of funding; and standards on safeguarding, anti-fraud and sanctions are not lowered. WADDAN buys locally where quality and value are competitive, advocates for direct funding of local organizations and publishes an annual localization report.

21 Partnership Due Diligence Policy

No partner receives funds or resources from WADDAN without completed, documented due diligence, proportionate to the partnership level and continuing through the partnership. Checks cover legal registration, governance, financial management, safeguarding, anti-fraud, sanctions, reputation, environmental and social capacity and programme capacity, and for larger sub-grants include audited statements, field verification and an external reference. Outcomes are approved, approved with conditions, deferred or rejected.

22 Sub-Grant & Partner Grant Management Policy

WADDAN remains accountable to the donor for all funds it sub-grants, and sub-grants exist to deliver the mission, not to pass money through. No sub-grant is issued without due diligence, sanctions screening, a confirmed budget, a signed agreement and the partner's safeguarding documents. Funds are released against milestones and after earlier advances have been accounted for, partners report regularly and are monitored, and ineligible spending is refunded.

5. Environment & Climate

23 Environmental & Social Safeguards (ESS) Policy

Every programme is screened for environmental and social risk at design and placed in a category: A (high risk, requiring a full impact assessment and Board approval), B (moderate, requiring a management plan and consultation), C (low, requiring a brief checklist) or FI (funds channelled through partners, whose capacity is assessed). Free, prior and informed consent is mandatory where programmes affect the land, resources or livelihoods of indigenous or tribal communities, and WADDAN does not support involuntary displacement. The policy sets standards on biodiversity, water, community labour and pollution, and requires monitoring, grievance access and incident reporting.

24 Climate Change Policy

WADDAN commits to reduce its own carbon footprint, mainstream climate risk in all programmes, advocate for climate justice and support adaptation. Every programme is screened for climate risk at design using the Pakistan Climate Risk Index and local hazard maps, with adaptation measures and budget lines. Operational commitments include an annual carbon footprint calculation, economy-class air travel, green procurement, a move to renewable energy (50% by 2027 and 100% by 2028) and climate-tagging 20% of the programme portfolio by 2027. WADDAN also pursues climate finance and evidence-based climate advocacy.

6. Data, Technology & Communications

25 AI Governance, Responsible Use & Data Protection Policy

WADDAN takes a human-centred approach: AI supports, and never replaces, human judgment. Five principles apply: human oversight, beneficiary data protection, transparency, bias prevention and personal accountability. Beneficiary personal data, safeguarding case data and sensitive programme data are never entered into publicly accessible AI tools, and only approved tools may be used. AI is not used to produce safeguarding assessments or disciplinary recommendations, to create deepfakes or to fabricate sources. Security controls and a data-breach protocol apply, and the policy is reviewed every six months.

26 Beneficiary Data Protection Policy

WADDAN holds beneficiary data in trust. Data is collected only for a stated programme purpose, with informed consent in the local language, and only what is necessary. Sensitive data (such as health, disability, ethnicity, displacement and protection concerns) needs specific written consent and restricted access, and children's data needs parental or guardian consent. Data is stored only on organizational systems with role-based access, encrypted, shared only under a data-sharing agreement and kept for 7 years after the programme or for the period the donor requires. Beneficiaries may ask what is held, request correction or deletion and withdraw consent.

27 Branding & Communications Policy

WADDAN protects its name, logo and voice as institutional assets and the dignity of the people it serves. Material representing WADDAN is cleared by the CEO before external release, and staff do not speak for WADDAN without written authorization. Written informed consent is required before photographing or recording anyone, children need parental consent and survivors are never identifiable. People are shown with dignity, staged or manipulated images are prohibited, donors are acknowledged as their grants require, and WADDAN's political neutrality applies without exception.

28 Advocacy & Public Positioning Policy

WADDAN advocates for the rights of communities in Khyber Pakhtunkhwa and Pakistan. Advocacy must be evidence-based, aligned with the mission, community-led where possible, compliant with regulators and donors, and reviewed for security risk. WADDAN does not support, endorse or oppose any political party, candidate or electoral process. Positions are approved at a level appropriate to their sensitivity, and every public statement is cleared before release.

Safeguarding Code of Conduct — public version

WADDAN has absolute zero tolerance for sexual exploitation, abuse, harassment, child abuse, trafficking, bullying, discrimination and any form of exploitation or harm. This Code sets out the behaviour every person associated with WADDAN must show, and the behaviour that is prohibited, so that beneficiaries, communities, colleagues and children are protected in all circumstances.

Must be signed before Day 1

Every member of the Board, every staff member, consultant, volunteer, intern and community mobilizer must read, understand and sign this Code before their first day of work. Sexual exploitation, abuse and harassment are prohibited absolutely, and failure to report a concern is itself a violation of this Code.

Who it applies to

The Code applies at all times, not only during working hours, to members of the Board, General Body and Advisory Board; all staff at every grade and location; consultants, contractors, interns and volunteers; community mobilizers and anyone representing WADDAN in field or community settings; and vendors, suppliers and implementing or sub-granted partners to the extent set out in their contracts. It applies in offices, field sites, vehicles, accommodation, events and online spaces.

Required behaviour

- Treat all persons with dignity and respect and without discrimination, at all times and in all locations.
- Report any safeguarding concern immediately to the Safeguarding Focal Person; not reporting is itself a violation of this Code.
- Maintain professional boundaries with all beneficiaries and community members.
- Follow the two-adult rule: never be alone with a child in any unsupervised setting.
- Obtain explicit informed consent, in the local language, before taking photographs, video or personal stories; obtain parental or guardian consent for minors.
- Maintain strict confidentiality of all beneficiary information, safeguarding reports and case data.
- Support gender-balanced field teams wherever operationally feasible, and respect gender-sensitive arrangements for accommodation, transport and travel.
- Complete safeguarding induction within 30 days of joining and the annual refresher where required.
- Cooperate fully and truthfully with any safeguarding inquiry or investigation.

Prohibited behaviour — absolute

- Sexual exploitation, abuse or harassment of any beneficiary, colleague or community member.
- Sexual or romantic relationships with direct beneficiaries, prohibited regardless of claimed consent.
- Exchange of money, goods, services or employment for sexual favours.
- Physical punishment, emotional abuse or deliberate humiliation of any child or adult beneficiary.
- Discriminatory behaviour or language based on gender, age, religion, ethnicity, disability or any other characteristic.
- Sexual activity with any person under 18, whatever the local age of majority or consent; any belief about a child's age is not a defence.

- Sharing identifiable beneficiary images, stories or data without specific written consent.
- Retaliating against, threatening or pressuring any person who reports a concern in good faith, or attempting to identify an anonymous reporter.
- Using a position of power or trust, or access to WADDAN resources, to obtain any personal or sexual advantage.

Child-safe conduct

- Two-adult rule: no staff member or volunteer may be alone with a minor in any unsupervised setting, with no exceptions.
- Children are never taken into private accommodation, vehicles or rooms alone, and are never asked to keep secrets.
- Activities with children are planned with at least two adults present and visible to others, with a female staff member present where possible.
- Written parental or guardian consent is required before any photograph, video or story of a child; no identifiable child's image or story is shared with third parties without specific written consent.
- Child labour, child exploitation and hazardous or exploitative work involving children are prohibited.

Digital and media conduct

- No personal digital contact, including WhatsApp and social media, with direct beneficiaries outside organizational channels.
- Use organizational messaging platforms for all programme-related communication with beneficiaries; personal phone messaging is prohibited.
- Never share beneficiary images on personal social media, and never enter beneficiary data into publicly accessible platforms or AI tools.
- Report any digital safeguarding incident, including online abuse or grooming, to the Safeguarding Focal Person within 24 hours.
- Do not post or share unverified information about WADDAN, donors or beneficiaries online.

Reporting a concern

Everyone covered by the Code must report concerns immediately and in any case within 24 hours to the Safeguarding Focal Person. A concern does not need to be proved before it is reported. Reporting channels are the Safeguarding Focal Person, a dedicated confidential email and the Board Chair for concerns involving the CEO or senior management. Anyone who reports in good faith is fully protected from retaliation, and retaliation is gross misconduct. Contact details are available at www.waddan.org/complaints.

Consequences of breach

A violation results in immediate suspension pending investigation, formal investigation, disciplinary action up to termination, legal referral, and disclosure to the relevant regulatory authorities and donors. For consultants, volunteers, interns, vendors and partners, breach leads to immediate suspension and termination of the engagement or contract. There is no time limit for serious safeguarding violations. Failure to report a concern, or retaliation against a reporter, is itself a violation.