

# POLICY HANDBOOK

Centre for Sport and Human Rights

Adopted by the Board of  
Directors on 1 April 2021



Centre for Sport  
& Human Rights

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## 1. INTRODUCTION TO THE POLICY HANDBOOK

1.1 This Policy Handbook ("**Handbook**") supplements and should be read in accordance with the Centre for Sport and Human Rights group's ("**CSHR**") core governance documents:

1.1.1 Articles of Association (as relevant to each CSHR entity); and

1.1.2 Code of Conduct;

and in accordance with other key policies and procedures adopted by the Board of Directors that apply to CSHR, including the Third Party Complaints Procedure, available on our website.

1.2 For employees, this Handbook should be read in accordance with the relevant Employee Handbook for the country in which you are employed.

1.3 This Handbook contains a number of our policies and rules for everyone working with or for CSHR in the conduct of any of their duties or activities associated with or for CSHR, including all our employees and long-term consultants (together "**Staff**" or "**Team Members**"), project consultants, retained professional advisors, volunteers, Directors, Trustees, Members, Member Representatives, Permanent Observers, Permanent Observer Representatives, the Chairperson, President, Vice-President(s), Advisory Council members and representatives, Special Advisors, Ambassadors, Research Fellows, observers, committee members, donors, advisers, interns, and any other persons who from time to time are involved in the governance, functioning and administration of CSHR (each, a "**Relevant Person**" or "**you**", and together, "**Everyone**") and may be a natural person, a representative of an organisation or an organisation (howsoever constituted and formally recognised). If you are unsure of the application of this Handbook to you, please ask for clarification.

1.4 Please note that CSHR's Code of Conduct prevails over any other policy or rule, including the policies in this Handbook. The Code of Conduct includes policies relating to behavioural standards, safeguarding, inclusion and diversity, non-discrimination, bullying, sexual exploitation, abuse, harassment, conflicts of interest, bribery, and fraud.

1.5 This Handbook has been designed to help you understand what additional standards and procedures you are expected to follow as an individual or organisation associated with us, as well as to help you understand how CSHR is structured and the organisational values at the heart of CSHR.

1.6 Everyone is responsible for compliance with the policies and rules in this Handbook. Depending on your relationship with CSHR, this Handbook may also complement your employment or other contract or agreement with CSHR, CSHR's Employee Handbooks for employees in Switzerland and the UK, and/or CSHR's Governance Handbook.

- 1.7 This Handbook is especially useful if you are joining CSHR or working with CSHR for the first time and should be provided as part of any induction process. If you are unsure what other documents apply to your role with CSHR or who your line manager or point of contact is, please consult CSHR's Deputy Chief Executive Officer ("**Deputy Chief Executive**").
- 1.8 This Handbook does not create further contractual relationships with CSHR beyond your existing engagement with us, however, this Handbook is intended to assist you in complying with your engagement agreements with CSHR.
- 1.9 In addition, CSHR maintains a number of additional operational procedures and guidelines, including Employee Handbooks, responsibility for each of which sits with the Chief Executive Officer ("**Chief Executive**"), and the Board of Directors maintain a number of governance policies including:
- 1.9.1 Sub-Committee Policy;
  - 1.9.2 Advisory Council Policy;
  - 1.9.3 Nominations Committee Policy.
- 1.10 This Handbook and the policies within it have been adopted by the Board of Directors. Adjustments and improvements to this Handbook may be made from time to time by the Chief Executive, with any material changes approved by the Board of Directors. The Board of Directors will undertake a review of CSHR's policies not less than every 2 years.
- 1.11 A breach of any policy in this Handbook could result in disciplinary action.

## 2. HUMAN RIGHTS POLICY STATEMENT

- 2.1 Our purpose is to advance a world of sport that fully respects and promotes human rights, and we pursue that purpose committed to respecting, upholding and protecting human rights in all that we do. In order to do that effectively, embedding human rights throughout our mission, values, culture, strategy and operations must come first. Therefore, it is only appropriate that we take a human rights-based approach to our programmes and activities and that we outline our own human rights commitments.
- 2.2 We recognise our responsibility to respect and promote human rights in accordance with in the Universal Declaration of Human Rights, subsequent United Nations conventions and declarations, and other international human rights instruments, principles and standards, including those expressed in the ILO Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights (UNGPs), as well as those that may apply to potentially vulnerable or marginalised groups such as the UN Convention on the Rights of the Child, and are committed to promoting and upholding the Sporting Chance Principles that underpin our work.

- 2.3 We adhere to all applicable laws and regulations wherever we operate. Where national law and international human rights differ, we will aim to follow the higher standard.
- 2.4 In practice, our work is grounded in the UNGPs. This means that we commit to:
- 2.4.1 Identifying, preventing and mitigating any human rights impacts that may occur through our operations as well as in connection to our business relationships. This could include where we host events and procurement for events, what platforms and services we use to conduct our business or our relations to other entities.
  - 2.4.2 Supporting access to remedy for any adverse human rights impacts that are caused or contributed to by our operations and activities.
  - 2.4.3 Communicating how we address human rights impacts and continuously reviewing this policy.
- 2.5 Failure to comply with any of the above will be resolved in accordance with our disciplinary policy as supplemented by this Handbook, the Code of Conduct and relevant safeguarding procedures.

### **3. POLICY ON WORKING WITH CHILDREN AND VULNERABLE ADULTS**

- 3.1 We acknowledge that violence against children and vulnerable adults happens throughout the world, in all settings, including in and around sport. This policy sets out our expectations of how Everyone must respect children and vulnerable adults and makes clear the standards applied and those actions that are not tolerated with respect to safeguarding.
- 3.2 Everyone must ensure that they are familiar with adhere to the Code of Conduct, which must be considered prior to any activity that impacts on children or vulnerable adults, including their images, stories, and data.
- 3.3 As set out in the Code of Conduct, we take a zero-tolerance approach to any form of bullying, harassment, physical, emotional or sexual abuse or sexual exploitation. This approach is re-emphasised with respect to children and vulnerable adults. In all actions and decisions, the welfare of children and vulnerable adults and their best interests will be the paramount consideration for all that we do. We are committed to ensuring that anyone working or associated with us in any capacity does not harm, abuse or commit any act of violence against a child or a vulnerable adult or take action or fail to act, resulting in risk to a child or vulnerable adult.
- 3.4 In adhering to best practice, we also follow the UN Secretary General's Bulletin "*Special measures for protection from sexual exploitation and sexual abuse*" (9 October 2003) and other international norms and standards. We recognise that all children and vulnerable adults have the equal right to

protection from harm and Everyone has a responsibility to act if they suspect a child or vulnerable adult is at risk of harm or has been harmed.

- 3.5 It is essential that a risk assessment is completed before engaging children or vulnerable adults. Should you consider that any work you do with or for us may lead to any interaction with children or vulnerable adults, or directly involve impact on children or vulnerable adults, you will promptly, and, prior to taking any other actions, notify our Head of Safeguarding and Protection.
- 3.6 In the context of any activities you undertake away from CSHR (for example your work for an Advisory Council member organisation or other third party), you are still welcome to discuss queries or concerns with our Head of Safeguarding and Protection. Where you are unsure, you are strongly encouraged to err on the side of caution and notify us.
- 3.7 When our activities or programmes plan to involve or impact children or vulnerable adults, we will conduct a risk assessment, and ensure we have relevant procedures and strategies in place to minimise any identified risk to protect children and vulnerable adults from harm prior to undertaking such programmes. These risk migration strategies will also be incorporated into the design, delivery and evaluation of the programme(s).
- 3.8 If we engage in work with a partner organisation who will have direct contact with children or vulnerable adults in order to undertake the relevant work, the agreement will state the responsibility of the partner(s) to develop and implement a child and/or a vulnerable adult safeguarding policy and procedures, including necessary risk assessments.
- 3.9 For the avoidance of doubt, and in accordance with the Code of Conduct, undertaking any CSHR activities which involve or impact children or vulnerable adults is not permitted without express permission from our Head of Safeguarding and Protection or the Chief Executive. It is also important to note that the Code of Conduct includes a duty on each Relevant Person to report any information concerning any perceived or actual behaviour, incidents or facts which may evidence or amount to a breach.
- 3.10 We take all reasonable precautions to ensure Staff, Directors, consultants, interns and volunteers do not pose a risk to children and we are proactive about building the capacity of our own Staff to understand their roles and responsibilities with respect to safeguarding. Our Head of Safeguarding and Protection will participate in specific trainings to be able to fulfil that role appropriately, monitor the implementation of our safeguarding commitments, provide or coordinate appropriate and regular safeguarding training to Staff and Directors, review all policies to ensure compatibility with our safeguarding commitments, and develop additional procedures where necessary for implementation.
- 3.11 Many of our activities take place online, and we generate a large number of communications materials and outputs in the conduct of our work. As we do

so, we are committed to representing children and vulnerable adults with dignity and respect and to at all times taking steps to meet our obligations for the best interest of the child, including as relates to their images, stories, and data. This commitment includes:

- 3.11.1 Protecting the best interest of the child over any other consideration, including advocacy for children's issues.
- 3.11.2 Avoiding communicating questions, attitudes and comments that are judgmental, insensitive to cultural values, cause embarrassment or humiliation, or that reactivate trauma for a child or vulnerable adult.
- 3.11.3 Avoiding the involvement of children or vulnerable adults in any story that puts them at risk of familial, community or political backlash.
- 3.11.4 Never using the full name or information that identifies the place of residence of any child or vulnerable adult, including in file names when sharing any images or files electronically, and never showing the face of any child known to be a victim of abuse.
- 3.11.5 Taking all precautions to ensure an informed decision where a young person over the age of 18 wishes to have their identifying information shared.
- 3.11.6 Respecting and complying with the child's wish to not have something reported, and taking into account child's right to participate, when in the best interest of the child.
- 3.11.7 Obtaining permission from the child and the child's parent or guardian for images or text about the child or family to be used, including an explanation of the intended purpose.
- 3.11.8 Ensuring authenticity by accurately portraying any child or vulnerable adult in their environment, and by not staging stories or photos, including by never asking anyone to adopt a contrived, artificial position or tell a story that is not their own. Communications should seek to understand and present the reality and context. Accurate captions should accompany all photos.
- 3.11.9 Seeking to empower the children or vulnerable adult by giving them as much control as possible. This means that their views about their situation and their direct quotes should be used as much as possible. Practices that give control over production of the story to children/vulnerable adults are encouraged, for example by permitting children to record images in the way they choose, considering children acting as journalists, or youth as paid reporters at our events, where relevant.
- 3.11.10 Reporting back to children/vulnerable adults after the story or photo or video has been published is strongly encouraged as a mark of

respect and to increase understanding about how their input has been used.

- 3.11.11 Storing any images of children or vulnerable adults in a secure and password protected format.
- 3.12 We recognise the value of photography at our events and in our work, and in accordance with this policy take specific precautions when photos feature children or vulnerable adults:
  - 3.12.1 For group photos it should be explained to the group of adults and/or children what the photographs will be used for and consent should come from individuals in the group. Any individual who does not wish to be part of the photo, should be able to opt out, without it negatively impacting their participation in the event.
  - 3.12.2 For general photos, when using images of children in crowd scenes where it may be difficult or impossible to get consent, please consider:
    - (a) Would they expect their photograph or video to be taken at the event? Is it a public space/event?
    - (b) Is it unlikely that anyone would object to the photo or video being taken?
  - 3.12.3 When taking photos or video at a planned event, let people know in advance that this will happen and how the images will be used so that they can opt out of the event or notify the organizers that they do not want their image used.
- 3.13 In accordance with General Comment No. 12 to the UN Convention on the Rights of the Child, the following nine basic requirements must be respected for all processes in which children are heard and participate, including the reporting process. Everyone should be familiar with and follow these requirements:
  - 3.13.1 *Transparent and informative.* Children must receive full, accessible, diversity-sensitive and age-appropriate information about their right to express their views freely and to have their views given due weight, and about how this participation will take place, its scope, purpose and potential impact;
  - 3.13.2 *Voluntary.* Children should not be coerced into expressing views against their wishes and must be informed that they can cease involvement at any stage;
  - 3.13.3 *Respectful.* Children's views must be treated with respect, and children should be provided with opportunities to initiate ideas and activities. Persons and organisations working for and with children should



respect children's views with regard to participating in events and meetings;

- 3.13.4 *Relevant*: Children should draw on their knowledge, skills and abilities to express their views on relevant issues. Space needs to be created to enable children to highlight and address issues they have identified as relevant and important;
- 3.13.5 *Child-friendly environment*: Environments and working methods should be adapted to children's capacities. Adequate time and resources should be available to ensure that children are well prepared and have the confidence and opportunity to contribute their views to the process;
- 3.13.6 *Inclusive*: Children are not a homogeneous group and participation needs to provide for equality of opportunity for all, including marginalized children, without discrimination on any grounds, including age, and be culturally sensitive to children from all communities. Special measures should be taken to include very young children and children from marginalized communities;
- 3.13.7 *Supported by training*: Adults need preparation, skills and support to facilitate children's participation effectively. Children also require capacity-building to strengthen their skills relevant to the reporting process, for example, in effective participation, awareness of their rights, public speaking and advocacy;
- 3.13.8 *Safe and sensitive to risk*: Adults have a responsibility towards the children with whom they work and must take every precaution to minimize the risk of violence, exploitation or any other negative consequences of their participation. Organizations facilitating child participation in the reporting process must have a clear child-protection policy in place for all the children who take part in activities related to this process;
- 3.13.9 *Accountable*: Children who have taken part in the reporting process (including in research, consultations, or the drafting the report) should be informed about how their views will be interpreted and used. CSHR will commit to ensuring that where we engage in any reporting processes that we will remain accountable through the process.

#### 4. SOCIAL MEDIA POLICY

- 4.1 Social media can be a powerful force for good, and we encourage Everyone to use social media in positive ways that advance our mission. As someone connected with CSHR you are both the person in the best position to tell the world about us and our work, and the person best suited to protect us and others from harm.

- 4.2 We recognise the benefits associated with the appropriate use of social media but also the risks of disclosure of confidential information and intellectual property, damage to our reputation, and even the risk of legal claims. To minimise these risks this policy sets out guidance applying to the use of social media.
- 4.3 Social media is always developing. It includes websites and applications that allow users to create and share content and/or take part in online networking. The most popular sites include the following (but this policy covers all social media, not just those listed here): Facebook; Twitter; LinkedIn; YouTube; Instagram; Snapchat; WhatsApp; TikTok; Pinterest; Flickr; Tumblr; Reddit. This policy applies to the use of social media for both business and personal purposes, during working hours and in your own time to the extent that it may affect our business or reputation. For the avoidance of doubt, this policy also covers personal blogs, any posts you might make on other people's blogs, any podcasts you create or contribute to, and all online forums and noticeboards.
- 4.4 We welcome your amplification of our mission, work, and outputs on your social media channels. If you do, make it clear in personal postings that you are speaking on your own behalf, in particular write in the first person and use a personal e-mail address. State that the views that you express are your views only (i.e. your handle/account is not an official CSHR handle/account). Include a notice such as "the views expressed on this website/blog are mine alone". This can be particularly helpful when those affiliated to us also have other affiliations (i.e. 'wear other hats') and content shared in relation to another role could possibly be perceived as being on behalf of CSHR.
- 4.5 We recommend the following as good practice:
- 4.5.1 *Encourage comments and be responsive.* Interacting with users across social media is expected on platforms and helps build trust within the community.
  - 4.5.2 *Address negative feedback quickly.* If users post complaints, or have other problems, follow them up positively and quickly (ideally before the issue spirals to illustrate awareness of the situation and that action is being taken).
  - 4.5.3 *Respond to mistakes.* If a posted content needs to be modified or edited, make it clear that it has been done. If an error has been made, correct it quickly and be up front about the mistake, as this can help restore trust.
  - 4.5.4 *Monitor all comments.* Ensure comments are checked regularly when posts are uploaded and communicate any issues to the relevant stakeholders.
  - 4.5.5 *Mute problematic commenters.* In the event of an escalation on social media, comments should be monitored to ensure any problematic

commenters are muted in the first instance if their comments are perceived as threatening, hostile, offensive or in some way contravening this policy. Blocking a user is generally discouraged, as this action is publicly visible and could increase, rather than decrease, tension or interaction.

4.5.6 *Notify as appropriate.* If you come across online content that could be perceived as potentially bringing us into disrepute please bring it to the attention of our Head of Communications.

4.6 In using social media, you should not:

4.6.1 make disparaging or defamatory statements about us, or any Relevant Person;

4.6.2 harass, bully or unlawfully discriminate others in any way;

4.6.3 use data obtained in the course of your engagement with us in any way which breaches our policies and procedures on data protection;

4.6.4 breach copyright belonging to us;

4.6.5 disclose sensitive business-related topics, such as on our performance, or do anything to jeopardise trade secrets, confidential information, and intellectual property;

4.6.6 make statements which cause, or may cause, harm to our reputation or otherwise be prejudicial to our interests;

4.6.7 post images or personal details of your colleagues without express consent from those being posted;

4.6.8 include our branding, logos, or other trademarks in any social media posting or in your personal profile on any social media platform without prior permission.

4.7 You must always show respect to others when using social media. A Relevant Person must never criticise CSHR, our clients, suppliers, business associates, or anybody else you come into contact with professionally through CSHR. Our other policies, in particular our Code of Conduct give guidance on the type of behaviour we consider unacceptable in the workplace, and we expect you to maintain the same high standards when online and using social media. Specifically, we will not tolerate any of the following:

4.7.1 abusive or threatening language or images;

4.7.2 sexually explicit language or images;

4.7.3 unlawful or disrespectful comments;

- 4.7.4 trolling (starting or pursuing arguments in an online community with the intention of disrupting normal discussions within that community);
- 4.7.5 false or misleading statements;
- 4.7.6 impersonating your colleagues or third parties; or
- 4.7.7 inciting somebody to commit a crime.

If any other Relevant Person is using social media to bully, harass or victimise you, you must follow the process in our Code of Conduct.

- 4.8 Personal use of social networking sites or blogs on the internet should be done in your own time and using your own computer systems. Use of personal Twitter and LinkedIn accounts can be permissible in work time if the content is work related (this exception will be reviewed on an ongoing basis).
- 4.9 We have a clear approach for articulating grievances in the Complaints and Grievances Procedure below and for employees in the relevant Employee Handbook, and thus encourage Everyone to use these means in the first instance, and avoid using social media or any other public form of communication that may be critical of us or any person connected to us.
- 4.10 You are personally responsible for what you communicate across social media. Often materials published will be widely accessible by the public and will remain accessible for a long time. If you are uncertain or concerned about the appropriateness of any statement or posting, feel free to discuss it with your line manager (where appropriate) or with our Head of Communications first. You must take personal responsibility for your social media content. If you can be identified as working for us or with us in a formal way, you must make sure your profiles, and anything you post, fit with how we expect you to present yourself to others. For Staff, be mindful that even if you do not name us as your employer, people who know you and where you work may still make an association with CSHR. If you are in any doubt about what is and is not acceptable, please talk to the Head of Communications.
- 4.11 Staff and Directors should not provide references for other individuals on social or professional networking sites, as such references, positive and negative, can be attributed to the organisation and create legal liability for CSHR. Where required, professional references should be provided on CSHR letter-headed paper or via official email channels via the relevant line manager. However, Staff can choose to endorse skills already listed on someone's profile on LinkedIn using their personal LinkedIn accounts, providing this is provided in a personal context and not associated with CSHR.
- 4.12 Official CSHR social media handles or profiles are managed by our Head of Communications. If you are required or permitted to operate our official social media handles or profiles in the course of performing your duties for or on behalf of CSHR, you must ensure that such use has appropriate

authorisation from the Head of Communications. If you leave our employment your access will also be stopped and we will ask for your user names and passwords. We may also ask for them at any other time and in either case you must supply them straightaway.

- 4.13 We may monitor your use of social media, along with your wider use of our ICT resources. We will only monitor this to insofar as it relates to compliance with this policy. However, whenever you use our ICT resources, profiles and systems, you give us your consent to monitor your activities.
- 4.14 If you breach this policy you may face disciplinary action. We may require you to remove any social media content that breaches this policy. You could also face legal proceedings if comments you post about us or you are found to have harmed named individuals. You should contact the Head of Communications if you find anything posted to a social media site that breaches this policy or otherwise brings us into disrepute.

## 5. DONOR POLICY

- 5.1 To deliver on our ambitious strategy, CSHR needs to raise funds. We are primarily funded by donations from our Advisory Council members and thus rely on donations from a range of sources to implement our work, seeking to balance income from a range of governments, foundations, sports bodies, companies, and others.
- 5.2 As an organisation that values collaboration and collective action, we view fundraising as an opportunity to work in partnership with donors to advance our mission, but endeavour to not be donor-led in developing strategies, programmes and activities.
- 5.3 Maintaining and safeguarding our independence, integrity, impartiality and reputation are paramount in any donor relationship we enter into. As such, the following conditions apply to any donor relationship:
  - 5.3.1 All donors are required to demonstrate support for the Sporting Chance Principles and for CSHR's purpose, as defined in our Articles of Association.
  - 5.3.2 Donations from sports bodies, companies and other private sector or professional sporting interests go into our core funding and are treated as unallocated funds with no conditions attached.
  - 5.3.3 Donations from governments and foundations may have conditions attached and be designated as allocated funding for the delivery of specific activities and programmes, provided such activities fall within the scope of our purposes and are aligned with our strategy.
  - 5.3.4 Donations will not be solicited or accepted from individuals, governments or organisations that we believe might use their funding relationship with us to deflect criticism from their own involvement in

human rights abuses, or with whom association would materially risk our reputation.

5.3.5 Any new donation from any new donor exceeding 100,000 CHF in any given calendar year that is not from an existing member of the Advisory Council must be approved by the Board of Directors.

5.3.6 Any donation of any amount will not be accepted from any party that (as can be reasonably ascertained) has profited from human rights abuses, or in the manufacture or trade of arms, tobacco or coal.

5.4 We do not provide any fee-for-service work or paid consultancy.

## **6. SIGNING AUTHORITY AND DELEGATION POLICY**

6.1 The Chief Executive has delegated authority from the Board of Directors to sign and enter into:

6.1.1 Any employment contract or consultancy agreement required to appropriately staff the organisation;

6.1.2 Donor contracts or agreements, in accordance with the Donor Policy;

6.1.3 Any other contract or agreement necessary for the management and operations of CSHR (other than employment contracts and consultancy agreements) up to the value of 100,000 CHF per year for any single agreement and up to a value of 50,000 CHF per year for any multi-year agreements.

6.2 For the avoidance of doubt, any disbursement or contract with a value exceeding 100,000 CHF per year for any single agreement or exceeding a value of 50,000 CHF per year for any multi-year agreements (other than employment contracts and consultancy agreements) must have prior authorisation from the Board of Directors.

6.3 The Deputy Chief Executive has delegated authority from the Chief Executive, approved by the Board of Directors, to sign any contract or agreement:

6.3.1 Relating to an employment contract or consultancy agreement where the Chief Executive has approved the terms of such contract or agreement;

6.3.2 Relating to any other provision of goods or services where the value is up to 10,000 CHF, or where the value is above 10,000 CHF and less than 50,000 CHF, where the Chief Executive has approved the terms of such contract or agreement;

6.4 Other members of Staff may be authorised to sign contracts, agreements or authorise payments on behalf of CSHR:

6.4.1 up to the value of 5,000 CHF where the Chief Executive or Deputy Chief Executive has authorised based on reviewing the terms; provided that no such contract or agreement is for more than 12-months and that specific written approval (including by email) is provided to the relevant member of Staff.

## 7. EXPENSES POLICY

7.1 All expenses incurred in the course of carrying out CSHR duties must be pre-agreed with your line manager (where relevant) or point of contact at CSHR subject to 7.4 below.

7.2 Reimbursement of all expenses are subject to them being submitted to your line manager or point of contact on the appropriate claim form within 28 days of being incurred and should be supported by relevant receipts.

7.3 For Staff, we will reimburse for travel costs incurred in the course of your employment or engagement with CSHR. For avoidance of doubt and in addition to 7.5 below, this does not include routine travel to and from scheduled workplaces (such as our office in Geneva) but does include out of hours emergency attendance and travel between workplaces if required. You are normally expected to use buses, tubes and standard class rail to travel on our business rather than taxis. Taxis may only be used when cheaper forms of transport are not available, in cases of emergency, or when efficiency or convenience obviously demand it.

7.4 We reserve the right to reject any expense claims which were not authorised before they were incurred. You should be prudent when incurring any CSHR related costs, obtaining quotes for comparable services where possible. Reimbursements are provided within 30 days by bank transfer with the provision of receipts.

7.5 For employees, this section should be read in conjunction with the Finance and Administration section of the relevant Employee Handbook.

7.6 Employees and long-term consultants are pre-authorised by this policy to incur reasonable business expenses of up to:

7.6.1 100 CHF without seeking prior approval;

7.6.2 1000 CHF with the written approval of their line manager, where their line manager is a budget holder, or otherwise from the budget holder; and

7.6.3 up to 5,000 CHF with the written approval of the Deputy Chief Executive.

Any costs above these amounts must be approved in writing by the Chief Executive.

## **8. ETHICAL PROCUREMENT POLICY**

8.1 Our commitment to diversity extends beyond our organisation. We also aim to provide opportunities to diverse suppliers that satisfy our procurement and contractual standards, including small, minority-owned, women-owned, disadvantaged/disabled, veteran owned and LGBTQ+ businesses and organisations. For Staff with procurement responsibilities, we encourage you to identify and include diverse suppliers and service providers in the procurement process.

8.2 Our relationships with suppliers are based on the fair and honest dealings at all times. In operationalising that commitment this policy requires that:

8.2.1 Everyone involved in procurement has a responsibility for sourcing and selecting services and products responsibly based on the principle of fair, honest and transparent dealings and in accordance with relevant policies and to secure value for money.

8.2.2 Achieving value for money does not always mean accepting the lowest price but, making decisions based on the above principles as well as price, quality of product and service, reputation and capacity of provider and environmental and social impact. We seek the purchase of goods and services that minimise negative impacts on the environment and society whilst meeting our business requirements. By incorporating social, environmental and ethical considerations into purchasing decisions we endeavour to make a positive contribution to the environment and society.

8.2.3 Running an advertised competitive tendering process should be normal practice when seeking to procure any goods or services over the value of 25,000 CHF or contracting with any consultant for a work assignment of more than 50 days in any 12-month period, with any deviation from this approach requiring a strong rationale (e.g., sensitivity or expediency) approved in writing by the Chief Executive.

8.2.4 Repeat contracts with service providers over the value of 25,000 CHF per year will be renewed by a competitive tendering process at least once every 3 years.

8.2.5 For employees, this section should be read in conjunction with the Procurement and Invoicing section of the relevant Employee Handbook.

## **9. TRAVEL POLICY**

9.1 We will always prioritise the health, safety and welfare of Staff and anyone travelling on our behalf when they travel overseas. If you perceive there to



be a risk to you in travelling to a particular location as part of your duties with CSHR, you may request that we conduct a risk assessment. Further to your request, we will endeavour to conduct a risk assessment and try to ensure that emergency arrangements are in place prior to the travel where required. Where possible, identified hazards will be eliminated; otherwise the risks will be reduced to as low as is reasonably practicable. All such assessments will take into consideration your personal circumstances including, nationality, religious beliefs, sexual orientation and any other matters you identify to us as being relevant. You may, at any time, refuse travel overseas where you have reasonable grounds for doing so.

- 9.2 If undertaking travel on behalf of CSHR, flights and accommodation will be booked by us on your behalf, unless otherwise authorised. Economy class fares are usually provided unless formally agreed otherwise or in line with our travel policy at the time of booking.
- 9.3 If you require a visa or visa waiver for travel on behalf of CSHR then we will also provide support in obtaining relevant the visa(s) or visa waiver(s).
- 9.4 If you have a medical condition which requires specific travel arrangements, you must make this known before travel bookings are made and you will be asked to produce a medical letter.
- 9.5 Our business travel insurance policies will provide cover for any trips you undertake on our behalf outside of your country of residence. Please contact us if you have any questions about the policy or if you need to declare any pre-existing medical conditions which may affect your travel plans and cover by the policy.
- 9.6 It is your responsibility to check official travel advice from the Swiss Federal Department of Foreign Affairs (FDFA) or British Foreign and Commonwealth Office (FCO) websites up until and including the day of your departure as these sources of travel information are referred to in our business travel insurance policies. It is also good practice to check the travel advice issued by the governments of countries where you are a citizen or resident. Please inform your line manager (where relevant) or point of contact if official sources advise against travel to the country or area you are planning to visit.
- 9.7 Travel to some countries or regions (principally those affected by conflict or that are post-conflict environments) requires specific agreement from our insurers to provide cover. Our Administrator maintains an up to date list of countries and regions that require additional cover, which is updated annually and circulated to Staff. If you are planning travel on our behalf to a conflict or post-conflict environment, or area you deem to be high risk, or is deemed high risk by official sources, then you must first consult with the Administrator.

- 9.8 If you are travelling and staying in a country for CSHR related work for more than 30 days, please let the Administrator know before making any bookings, as extended cover must be agreed with the insurers.
- 9.9 Our business travel insurance policies do not provide cover for any personal trips you may wish to add to any work trip, so please ensure you have separate cover in place if this is relevant.
- 9.10 For employees, this section should be read in conjunction with Travel section of the relevant Employee Handbook.

## 10. RECRUITMENT POLICY

- 10.1 We are an equal opportunities employer and our commitment to inclusion, diversity and non-discrimination is set out in the Code of Conduct. In practice, this means that everyone should have an equal chance to apply and be selected for vacancies, and objective and merit-based processes for recruitment and promotion are applied.
- 10.2 Our Recruitment Procedure and our Onboarding Procedure set out transparent and formal processes by which we seek to hire and bring in new colleagues. These procedures specify that any new roles we create should meet capacity gaps, contribute to our mission, and attract staff members who can enrich our team culture. The Chief Executive must approve any new recruitment. Shortlisting should be done by more than one person where possible, and advertisements should avoid stereotyping or using wording that may discourage particular groups from applying.
- 10.3 All staffing vacancies should be advertised externally, including consultancy work which consists of more than 50 days (or if for less than 50 days but has the likelihood of being extended or developed into a long-term role). Vacancies should be promoted widely with a focus on advertising on websites and platforms that reach a diverse pool of talent. In rare occasions where it is preferable to recruit externally without advertising, then approval from the Board of Directors must be given.
- 10.4 Job applicants must not be asked questions which might suggest an intention to discriminate on grounds of a Protected Characteristic. For example, applicants must not be asked whether they are pregnant or planning to have children. Job applicants must not be asked about health or disability before a job offer is made.
- 10.5 We are committed to developing, retaining and investing in our existing Staff and offering opportunities for advancement, development and promotion. This includes earmarking an annual budget for training and development to be allocated in accordance with the Training and Development Guidelines.
- 10.6 CSHR is currently registered as an employer in Switzerland and UK and we have a preference to offer employment contracts where possible.

- 10.7 CSHR is also committed to having a global team with colleagues in different locations around the world. This means engaging certain core Staff on long-term consultancy agreements depending on their location. Employees and consultants have to be treated differently by law, with differences including pension and social security entitlements, access to CSHR resources and equipment, and the level of management control and supervision exercised. We comply with all such requirements while seeking to create an integrated team environment regardless of the contractual basis by which a Staff member is engaged. We will also actively seek to register as an employer in additional jurisdictions where feasible and operationally required.
- 10.8 Having competitive remuneration is one of the ways in which we can secure the very best people to deliver on our strategy. Aiming to maximise our impact through fair remuneration for talented people is what defines our approach to pay. We regularly benchmark our pay scale against the NGO, charitable and think tank sectors in the locations where we are registered. Where Staff members are engaged on long-term consultancy contracts elsewhere in the world, those rates correspond with equivalent salaries offered to employed Staff, and apply wherever in the world a long-term consultant is based. CSHR's pay scale is reviewed annually by the Board of Directors.
- 10.9 As part of our commitment to creating a safe work environment, we are committed to ensuring that all Staff are appropriately background-checked ahead of joining the team and will endeavour to conduct reviews at an appropriate level as part of the recruitment process for each member of Staff, including, where available, references from previous employers. This commitment to safe recruitment is further set out in our Safe Recruitment Procedure, and is referenced in every job advert we issue.
- 10.10 As part of our commitment to employees we take a progressive and inclusive approach to parental leave. For specific information on the parental leave that we provide, employees should review the relevant Employee Handbook.
- 10.11 We believe that the promotion of flexible working can increase motivation, promote work-life balance, reduce stress and improve performance and productivity. Therefore, we endeavour to be flexible on working patterns for all Staff. In turn, we also recognise that staffing levels must remain in line with the demands of the organisation at all times. As such, requests to change your working conditions will be considered fairly and objectively, subject to consideration of relevant business needs and in accordance with the relevant Employee Handbook.

## 11. INTERNSHIP POLICY

- 11.1 We aim to provide high quality internship opportunities for individuals with interest and potential in fields relating to sport and human rights.
- 11.2 We do not offer unpaid or *ad hoc* internships. However unpaid academic placements are available specifically for students who receive either

academic credit or a stipend from their university or institution of higher learning in accordance with our Internship Procedure.

- 11.3 Remunerated work placement internships, where available, will be designed to support our programme needs, will pay a living wage, and will be competitively advertised on our website.

## 12. CONFIDENTIALITY POLICY

- 12.1 An important part of confidentiality is maintaining privacy and respecting the wishes of any party disclosing information. As part of CSHR's mandate, a number of third parties share confidential information with CSHR and ask for assistance in addressing issues in a confidential manner. Maintaining that confidentiality is crucial to CSHR's mission and you are responsible for maintaining this confidentiality.
- 12.2 During the course of your association with CSHR you may obtain documents and information that are confidential. This information may be specifically designated as confidential or be information disclosed under the Chatham House rule, or may be flagged as confidential by the manner in which the information is conveyed, or CSHR may request that the information is treated confidentially.
- 12.3 Various confidentiality provisions exist in CSHR's Articles of Association and Code of Conduct. If you have an employment contract or consultancy agreement with CSHR that will also include confidentiality clauses. You may otherwise have entered into a non-disclosure agreement with CSHR. In case of any doubt you should discuss any concerns with your line manager or point of contact. This duty does not prevent you from disclosing confidential information where expressly authorised or where required to by law.
- 12.4 We also recognise the highly sensitive nature of information relating to affected persons, in particular where there are ongoing cases. Where we are privy to information that concerns the violation or potential violation of an individual's human rights, and that information is not widely in the public domain, then we will take extra care with that information and take steps to restrict the sharing of that information internally and externally. In such circumstances, our Case Handling Protocol will apply, pursuant to which a member of Staff will be designed as the lead case handler and an assessment will be made to determine the level of risk posed by a breach of confidentiality and whether enhanced confidentiality measures are required, including strict limitations on Staff access to information and additional data security measures.

### **13. MEETINGS POLICY**

- 13.1 CSHR Staff work from an office in Geneva and remotely from different locations around the world. Where necessary, we use meeting spaces booked as required. When planning a meeting you should consider:
- 13.1.1 Public meeting spaces should only be used if there would be no jeopardy to confidential or sensitive information. Individuals must use their discretion when using such locations and always comply with the Confidentiality Policy, above.
  - 13.1.2 We do not consider an individual's home or a hotel room to be a suitable place to meet for any CSHR business.
  - 13.1.3 We promote the use of technological alternatives for teleworking, such as Skype and Zoom (video and audio conferencing) and teleconferences to negate the need to travel except where absolutely necessary.
- 13.2 We endeavour to choose meeting venues with good corporate social responsibility and environmental policies and will wherever possible use sustainable venues. This includes those which have a commitment to sustainable practices, and for example use recycled delegate materials, offer wireless services to minimise use of paper and have policies in place to be energy efficient and reduce waste. For more information on this, please see our Sustainability Guidelines for Meetings and Events.

### **14. DATA PROTECTION POLICY**

- 14.1 Our commitment to data protection is included in the Code of Conduct.
- 14.2 In order to keep and maintain records relating to your association with CSHR it is necessary for us to record, keep and process personal data relating to you. This data may be recorded, kept and processed electronically or in a hard copy form. We may on occasion have need to disclose this data to others, (this may be to carry out our obligations under our contract with you or for our legitimate interests) including our employees, our accountants, our HR Advisors and professional advisers, relevant revenue and tax authorities, and other authorities. This information will be processed in accordance with data protection principles as set out in the UK Data Protection Act 2018 (the "Data Protection Act"). This does not affect your rights as a data subject under the EU General Data Protection Regulation 2016 (GDPR) or obligations under the Data Protection Act.
- 14.3 You have the right to know what data is held by us about you. Requests for a copy should be made to our Administrator and your line manager (where appropriate) or point of contact.

- 14.4 We are GDPR compliant and will process and store your personal information accordingly. Internal data management processes are set out in this policy, supplemented by a public facing Privacy Notice maintained on our website.
- 14.5 Staff members receive training and guidance about GDPR compliance. Please ensure you adhere to GDPR requirements in your work. Contact the Administrator should you have any queries.
- 14.6 Employees should read this policy in conjunction with the Personnel Records section of the relevant Employee Handbook.
- 14.7 CSHR controls the names and contact details (largely names and email addresses) of organisations and individuals that Staff have met or who are interested in CSHR's work and/or sport and human rights more generally. Personal data such as contact details, are used for individual communications and for more widely shared communications around our work and events.
- 14.8 Contact lists are only shared externally for events co-hosted by CSHR with the partner co-hosts. Contact lists are used only for the purposes of inviting individuals to events, or sending reports and newsletters and are not used for any other purpose. The main legal basis for keeping these contact lists is legitimate interest. CSHR has applied the UK ICO three-part test and the conditions apply. The three-part test requires identification of: (i) a legitimate interest, (ii) evidence that the processing is necessary to achieve it; and (iii) balance against the individual's interests, rights and freedoms.
- 14.9 Contact lists are shared occasionally with partner-hosts (as data processors) when required, to see and add to invite lists. The processing is necessary for the legitimate interests of the third party. Where that is the case, partner-hosts are informed by CSHR that the lists are only to be used for the prescribed purpose and should be deleted afterwards. Lists shared externally must be password protected and the CSHR Administrator should be informed when personal data is shared externally. CSHR will never sell or give any personal data to a third party for any purposes other than for co-hosting an event. Where a third-party data processor is used, invitee lists will be deleted from the data processor account after the event.
- 14.10 Staff are often given business cards so that individuals can be informed about our work. The basis for this contact is consent and legitimate interest. It is recommended for a business card to be shredded after the data has been captured electronically. If not, it should be stored securely, and Staff should make a note on the Information Asset Register.
- 14.11 We sometimes generate participant lists after CSHR hosted or co-hosted events. For all events, we will notify participants in advance that they will be included in the participant list to be distributed after the event. To all those who accept an invitation and where we intend to circulate or publish a participant list, we will give a clear option to be excluded.

- 14.12 CSHR controls a list of subscribers to our e-newsletter, which is processed by MailChimp (a marketing automation platform). MailChimp participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework. The EU-US Privacy Shield is an approved certification mechanism under Article 42 of the GDPR.
- 14.13 The external Privacy Notice posted on our website states that the email addresses of subscribers are transferred to MailChimp for processing in accordance to their GDPR compliance policy and provides links to the relevant webpages. Additionally, individuals can unsubscribe from the e-newsletter by clicking on the unsubscribe link on any e-newsletter, or no longer receive communications from us by emailing [privacy@sporhumanrights.org](mailto:privacy@sporhumanrights.org) to request this. The legal basis for holding this data is consent, and CSHR has the express consent of subscribers.
- 14.14 For human resources purposes, we capture personal details (including date of birth, address, contact details, national insurance numbers etc.) of current and past Staff and those who have agreements with us. This information is processed by the Deputy Chief Executive and Administrator. Some data is also processed by our accountants, payroll consultants, and human resources consultants. In each case, their respective data protection policies have each been reviewed and are maintained on file. The legal basis for holding this data is contract. All the above information is stored and used purely for CSHR to legitimately perform its function as an employer.
- 14.15 We control passport information of some Staff, Directors, guests, and others for whom we book flights to attend our meetings and events. Passport details are held in a folder accessed only by the Administrator. Where required, such data is also shared with and processed by third parties (e.g., our travel agent). The legal basis for this is consent and contract. CSHR does not use passport information for any reason other than that approved by the person (i.e., booking travel, obtaining visas for travel, registering for events etc.). We delete passport information of individuals when the relationship with the individual comes to an end.
- 14.16 We hold covering letters and CVs sent to us by candidates for current and past vacancies advertised. We will hold on to CVs for up to 12 months after the job application deadline.
- 14.17 Functional and analytical cookies collect data for the effective management of our website. More information on cookies can be found in our website Privacy Notice online.
- 14.18 CSHR stores personal data on DropBox. Some personal data is also stored on the local drives of Staff members. We have minimum standards across the organisation on laptop security practices (further details can be found in the relevant Employee Handbook and the ICT Policy, below). Under management supervision, the Administrator updates staff on an annual basis

on security measures that should be taken to ensure personal data is protected under all circumstances. Security measures include:

- 14.18.1 All documents containing personal data must be registered on the Information Asset Register.
  - 14.18.2 If any personal data files (i.e., contact lists) are shared externally, external parties must be informed that they are to be used only for the prescribed purpose and should be deleted afterwards.
  - 14.18.3 Such files must be protected with a password, and the password shared in a separate email or other secure means.
  - 14.18.4 The Administrator must be informed when personal data files are shared externally.
- 14.19 CSHR sometimes gives access to third party data processors to manage our data (e.g., Google, Dropbox). The Administrator maintains a list of our data processors and their data processing agreements, which are either general and online or client specific and on file.
- 14.20 If a security incident takes place, we will act quickly to establish whether a personal data breach has occurred, and if so, determine the likelihood and severity of the resulting risk to people's rights and freedoms and decide what steps must promptly be taken to address it (including informing the UK ICO of a notifiable breach within 72 hours). A personal data breach is a security incident that has affected the confidentiality, integrity or availability of personal data. This is whenever any personal data is lost, destroyed, corrupted or inadvertently disclosed; if someone accesses the data or passes it on without proper authorisation; or if the data is made unavailable, for example, when it has been encrypted by ransomware, or accidentally lost or destroyed. This includes breaches that are the result of both accidental and deliberate causes. We recognise that a personal data breach isn't only about loss or theft of personal data, and affected individuals must be informed without undue delay.
- 14.21 Any security incidents or potential breaches must be reported to the Administrator immediately, who will escalate to the Deputy Chief Executive and/or Chief Executive when required. All security breaches, its effects and the remedial action taken will be recorded, regardless of whether or not they need to be reported to the UK ICO. Additionally, we will investigate whether or not the breach was a result of human error or a systematic issue, and see how a recurrence can be prevented. We may also notify third parties such as the police, insurers, professional bodies, or banks who can help reduce the risk of financial loss to individuals.



14.22 The GDPR provides the following rights for individuals:

- 14.22.1 The right to be informed about the collection and use of your personal information.
- 14.22.2 The right of access, this allows you to be aware of and verify the lawfulness of the processing.
- 14.22.3 The right to rectification, to have inaccurate personal data rectified, or completed if it is incomplete.
- 14.22.4 The right to erasure – this is the right to be forgotten, it is not absolute, and only applies in certain circumstances.
- 14.22.5 The right to restrict processing – it is not absolute, and only applies in certain circumstances.
- 14.22.6 The right to data portability – this allows you to obtain, reuse and move your personal data in a common format across different services.
- 14.22.7 The right to object to processing based on legitimate interests, direct marketing and or processing for purposes of research and statistics. We do not currently engage in direct marketing.
- 14.22.8 Rights in relation to automated decision making and profiling. We do not make any automated decisions.

Individuals are able to exercise any of the above rights by contacting the Chief Executive and Deputy Chief Executive in writing.

- 14.23 Individuals will be given access to the information held on them by us on request. If asked to remove/rectify someone's contact details this will be actioned immediately with no administration fee for this. We will include in our email signature a link for people to follow if they wish to see our published Privacy Notice. From there, they can ask to be removed from future invite lists, or from our records altogether. Removal/rectification from our newsletter mailing list is actioned directly through MailChimp.
- 14.24 Current and past Staff and payees are informed that they can ask us for information held on them and can request we delete/rectify any information held. There will be no administration fee for this.
- 14.25 All passport information is sent voluntarily to us by passport holders. If any passport holder requests that we remove/rectify data, this will be actioned immediately with no administration fee.
- 14.26 CVs or related documents held on file by applicants or previous team members will be deleted on request.

- 14.27 If an individual asks for access to their personal information, for it to be updated, or for their personal information to be removed from our records, we will use the Information Asset Register to identify the documents in which the data is stored. Additionally, to ensure we fully comply with any requests, a DropBox wide search of their name will be undertaken to ensure that all records are revealed (including those possibly not on the Information Asset Register).
- 14.28 We will keep a record of all individuals who assert the right to be forgotten. Staff should check this record before communicating externally, but especially before sending out invitations or other information.
- 14.29 Individuals can opt out of receiving invitations from us by emailing [privacy@sporhumanrights.org](mailto:privacy@sporhumanrights.org) – this is different from the right to erasure. We will keep a record of all individuals who request not to be contacted further. Staff should check this record before sending out invitations or other information.
- 14.30 MailChimp is the data processor for our Newsletter and updates and will revise the newsletter mailing list on our behalf when unsubscribe notifications are received.

## 15. INFORMATION AND COMMUNICATIONS TECHNOLOGY POLICY

- 15.1 We are the guardian of considerable amounts of sensitive data and are regularly in contact with vulnerable groups and human rights defenders whose communications may be targeted or monitored. It is necessary to put in place some general rules on the use of Information and Communications Technology (ICT) equipment and outline basic etiquette when communicating with others.
- 15.2 These rules apply to the use of all electronic facilities and devices provided by us as well as those used to conduct CSHR activities by any Staff member.
- 15.3 You must not:
- 15.3.1 gain deliberate unauthorised access or violate the privacy of other peoples' files, facilities or services, corrupt or destroy other peoples' data or disrupt the work of other people;
  - 15.3.2 engage in activities which may result in the introduction of viruses, trojans or similar malicious software onto devices that may compromise CSHR data;
  - 15.3.3 engage in activities which are illegal or which might contribute to an illegal act;
  - 15.3.4 engage in any interaction purporting to be representing CSHR when not authorised;

- 15.3.5 delete, destroy or modify existing systems, programmes, information or data (except as authorised in the proper performance of your duties);
  - 15.3.6 download or install software from external sources without authorisation from your line manager. Downloading unauthorised software may interfere with our systems and may introduce viruses or other malware;
  - 15.3.7 access any web page or download any image or other file from the internet which could be regarded as illegal, offensive, in bad taste or immoral. Even web content that is legal in Switzerland or the UK may be in sufficient bad taste to fall within this prohibition. As a general rule, if any person (whether intended to view the page or not) might be offended by the contents of a page, or if the fact that our software has accessed the page or file might be a source of embarrassment if made public, then viewing it will be a breach of this policy; or
  - 15.3.8 provide access to CSHR data (including files and communication) to unauthorised people.
- 15.4 We request that you have the minimum security settings on the devices you use for your CSHR work and for security updates to be applied as soon as they are available. The "minimum" includes anti-virus, a firewall, Malwarebytes, password log in and disk encryption. A Virtual Private Network (VPN) should be used to access region-restricted websites, and to shield your browsing activity from prying eyes on public Wi-Fi.
- 15.5 You must not send electronic mail or distribute material which is illegal, irresponsible, threatening or may cause offence nor use network messaging without authority. "Irresponsible" use includes unsolicited postings to large numbers of people, indiscriminate postings or postings which may distribute confidential information to a wider group than should have access. You must comply with the requirements of all relevant legislation, including the GDPR particularly when sharing personal data. Please contact the Administrator if you require more guidance about this.
- 15.6 If you have been entrusted with sensitive information or have access to folders or documents which contain sensitive information, please ensure that you safeguard that data as fully as you can. Do not share your passwords with anyone or provide visibility to your devices if the data is on display, and when working from home or in a public space, please ensure that you take care to safeguard your screen when accessing that information. Do not leave yourself logged into any files or accounts once you have finished using them.
- 15.7 You are expected to abide by all CSHR security measures such as two-step verification for email accounts and DropBox (where access to such resources has been provided by us).

- 15.8 For employees, this section should be read in conjunction with the Technology Security section of the relevant Employee Handbook.
- 15.9 Always remember that emails, as well as files in drive storage can be compelled by authorities for use in legal proceedings and that deleted emails and files may be possible to recover for these purposes.

### **Email Accounts and Dropbox**

- 15.10 If you are provided with an CSHR email account for your role with CSHR, it should be used in regard to your role only. A modicum of personal email is acceptable, but not where the perusal and sending of such infringes on the work or CSHR, including in loss of working time to CSHR.
- 15.11 Emails received into CSHR mailboxes or sent on behalf of CSHR are the property of CSHR. CSHR email account holders must not use the email forwarding mechanism to have their CSHR emails forwarded to their personal email accounts. Staff can use a desktop mail client (e.g. Outlook) to access their CSHR email account.
- 15.12 Those using a CSHR email account should give particular attention to the following:
- 15.12.1 standard of presentation: the style and content of an email message must be consistent with the standards that we expect from written communications;
  - 15.12.2 extent of circulation: email messages should only be sent to those for whom they are particularly relevant;
  - 15.12.3 hasty messages, sent without proper consideration, can cause unnecessary misunderstandings;
  - 15.12.4 visibility of e-mail: if the message is confidential, the user must ensure that the necessary steps are taken to protect confidentiality;
  - 15.12.5 offers or contracts transmitted via e-mail are as legally binding as those sent on paper.
- 15.13 Please exercise caution when receiving emails from an unknown source or that look suspicious. You must not open attachments or click on a link in emails from an unknown or suspicious source. If in doubt, please contact the Administrator.
- 15.14 If you are experiencing any issues with your CSHR email account, including the request to reset your password, please contact the Administrator in the first instance.

## **Passwords and access to information**

- 15.15 You are responsible for ensuring that data stored or accessible via the electronic devices you are responsible for are not accessed by anyone unauthorised. Devices you use for your role with CSHR should be set with a password or code that is required after sleep mode. Two-step verification must be enabled for CSHR email accounts and access to DropBox folders (where access to such resources has been provided by us).
- 15.16 You should exercise caution when logging on to public wi-fi networks. We advise caution in using password-free public wi-fi networks as this increases the risk of the data traffic being sent from your device being captured by someone unscrupulous who is also on the network. We also advise that your device is set to 'forget' the network when you leave. Using your phone's mobile internet as a hotspot is advised where possible.
- 15.17 It is important that you choose a secure password for your CSHR activities which require passwords or codes. CSHR's security is only as secure as its weakest password. A recommended resource is: <https://howsecureismypassword.net/> which can assist you in choosing a password which is less vulnerable to hacking, and highlight how vulnerable your current password is. Passwords must include a combination of digits, letters and special characters, and ideally be ten characters long.
- 15.18 CSHR recommends that sensitive information such as passwords should only be shared through an encrypted and trusted service such as [www.deaddrop.me](http://www.deaddrop.me).
- 15.19 Documents containing information of a sensitive nature should be password protected. If you need help to do this, please ask the Administrator. This particularly applies to documents:
- 15.19.1 sent by email externally;
  - 15.19.2 sent on public wi-fi networks; or
  - 15.19.3 containing sensitive or personal information, such as email addresses of contacts.

## **Cloud-Based Storage and Backup**

- 15.20 We use DropBox for cloud-based storage to share files among Staff (draft and working documents as well as archive and storage of useful and relevant documents). If it is relevant to your CSHR activities you will be provided access to the relevant folders or be provided with a DropBox account. If you have access to and are unsure if a document of a sensitive nature should be shared in the CSHR main filing system or another shared DropBox folder, you must check with your line manager or point of contact. The Administrator can also provide further guidance about DropBox use including if you have accidentally deleted a file or folder in DropBox.

- 15.21 For security reasons, work files should not be stored locally (e.g., on desktop or phone) at any time. DropBox allows you to save personal files in a private folder, and the DropBox app allows you to access and work on files while offline. For more information, contact the Administrator.
- 15.22 Once you have left CSHR, or if your role no longer requires access to DropBox or some DropBox folders, your access will be removed.
- 15.23 You may also use an external hard-drive device to back up data, however we request that this device be encrypted and stored securely so it cannot be accessed by anyone not authorised. The device must also be in a locked stored location different from where the device it backs up is kept.

## 16. WHISTLEBLOWING POLICY

- 16.1 We encourage an open culture in all our dealings with everyone associated with CSHR and all the people with whom we come into contact. Effective and honest communication is essential if malpractice is to be effectively dealt with. The whistleblowing procedure below provides guidelines to Everyone associated with us who feels they need to raise issues relating to suspected misconduct, illegal acts or failure to act. At all times, we encourage you to first raise concerns internally through your line manager or point of contact and with reliance on other policies and procedures available to you.
- 16.2 The UK Public Interest Disclosure Act 1998 (the 'Whistle Blowing Act') sets out a framework to promote the responsible and protected disclosure of concerns on the following matters:
  - 16.2.1 That a criminal offence has been committed, is being committed, or is likely to be committed.
  - 16.2.2 That a person has failed, is failing, or is likely to fail to comply with a legal obligation which they are subject to.
  - 16.2.3 That a miscarriage of justice has occurred, is occurring, or is likely to occur.
  - 16.2.4 That the health and safety of an individual has been, is being, or is likely to be endangered.
  - 16.2.5 That the environment has been, is being, or is likely to be damaged.
  - 16.2.6 That information tending to show any matter falling within the matters above has been, is being, or is likely to be concealed.
- 16.3 The procedure is not a substitute for our Complaints and Grievances Policy or Employee Grievance Procedure and is not a channel for Staff to raise matters in relation to their terms and conditions of employment or consultancy. The procedure allows individuals to have their concerns treated in confidence. All concerns must be raised in good faith. Anyone who abuses the procedure

(for example by maliciously raising a concern they know to be untrue) will be subject to disciplinary action, as will anyone who victimises an individual by raising a concern through this procedure.

16.4 We will not tolerate the victimisation of anyone raising a genuine concern and anyone responsible for such conduct will be subject to disciplinary action. You may decide that you want to raise a concern in confidence. Therefore, if you ask for your identity to be protected, it will not be disclosed without your consent. If a situation arises where it is not possible to deal with the concern without revealing your identity (for instance because your evidence is needed in court or a disciplinary hearing), there will be a discussion as to whether and how we can proceed. This policy does not cover the situation where information about malpractice is received anonymously; however, discretion will be used in the investigation of such information.

16.5 How to raise your concern:

16.5.1 If you have a concern about malpractice, it is asked that you raise it first with your line manager or point of contact in writing. You should include the date the alleged wrongdoing was identified, the nature of the concern and any supporting information, the names of any alleged wrongdoers and what action (if any) you are seeking from us. If you have a direct or personal interest in the matter, you should also let it be known at this stage.

16.5.2 If you feel unable to raise the matter with someone in your line management, for whatever reason, please speak to either the Chief Executive or Deputy Chief Executive. If you do not feel able to raise the matter with the Chief Executive or Deputy Chief Executive, you may raise it directly with the Chairperson of the Board of Directors.

16.6 When raising a whistleblowing concern you can request that CSHR not report the details of your concern to the relevant authorities where applicable. CSHR retains all discretionary authority to report your concern to the relevant authorities including but not limited to situations where it is legally obliged to do so. If CSHR decides to report your concern in spite of any request to the contrary it will inform you in writing that it is doing so prior to any notification.

16.6.1 If you want to raise the matter in confidence:

(a) CSHR will ensure that practical measures are put in place to protect your identity. Your identity will not be disclosed without your consent, unless CSHR are required to do so by law;

(b) alternatively, you may submit your concern through the following weblink through an online form should you wish to do so in confidence: [www.sporhumanrights.org/whistleblowing](http://www.sporhumanrights.org/whistleblowing).

- 16.7 Once you have reported your concern, CSHR will look into it to assess initially what action should be taken. We will let you know if your concern falls more appropriately within our other policies. Should your concern fall within this policy, as indicative only we set out our approach to handling your concern, however, please note that this process is assessed on a case by case basis to ensure you are comfortable:
- 16.7.1 you will be informed of who is handling your concern including their contact details;
  - 16.7.2 you will be invited to a meeting to discuss your concerns, and you are entitled to be accompanied at this and any subsequent meetings by a colleague or trade union representative. If you bring a companion, we ask that you both agree to keep your disclosures confidential before and after the meeting and during any investigation that may follow;
  - 16.7.3 after the initial meeting, we will investigate your concerns and we may ask you to attend further meetings. To investigate properly, we may involve specialists (at our expense) with particular knowledge or experience of the issues you have raised;
  - 16.7.4 we will keep you informed, in general terms, about how our investigation is progressing and how long is it likely to take. We may not be able to give you details about the investigation (or any action it leads to) as we need to protect confidentiality and comply with legal obligations. We understand this may be frustrating, and so we will do our best to reassure you that things are in hand and to explain why we are acting in the way we are;
  - 16.7.5 your concerns will be addressed fairly, but we cannot guarantee the outcome of our investigations will be the one you want. If you are not satisfied with how we have conducted the investigations, you can take the matter to the Chief Executive for further consideration.
- 16.8 While the purpose of this policy is to enable CSHR to investigate possible malpractice and take appropriate steps to deal with it, we will give you as much feedback as we properly can. Please note, however, that we may not be able to tell you the precise action taken where this would infringe a duty of confidentiality owed by the organisation to someone else.
- 16.9 CSHR may not need to formally investigate every concern raised; i.e. where the situation is a misunderstanding can be resolved through the provision of information.
- 16.10 The investigator will decide who and what will be included in the investigation (including meeting with any alleged wrongdoers) and can decide to hold meetings or request written statements depending on the details of the case and the information required.



- 16.11 On conclusion of any investigation, you will be told the outcome of the investigation and what CSHR proposes to do about it. If no action is to be taken, the reason for this will be explained.
- 16.12 In most cases CSHR would let someone know when they are the subject of an allegation. However, where this is problematic (e.g. may cause unnecessary stress or there is a risk that letting them know may lead to destruction of evidence) then we may feel it necessary to conduct a preliminary enquiry before sharing the allegation with all named parties.
- 16.13 If misconduct is discovered as a result of any investigation under this procedure, our disciplinary procedure will be used, in addition to any appropriate external measures. Maliciously making a false allegation is a disciplinary offence.
- 16.14 If you are concerned that the Chief Executive is involved in the wrongdoing, has failed to make a proper investigation or has failed to report the outcome of the investigations to the relevant person, you should escalate the matter to the Chairperson of the Board of Directors. The Chairperson of the Board of Directors will arrange for a review of the investigation to be carried out, make any necessary enquiries and make their own report to the Board of Directors.
- 16.15 CSHR will respect all your statutory rights, however it should be noted that alerting the media to a concern, particularly before or during an internal investigation may hinder investigations. We would normally expect you to have taken all reasonable steps to deal with the matter internally or with an external regulator, and to have taken full advice from a lawyer or from an organisation such as Protect before being justified in approaching the press.
- 16.16 In the UK context, you can get further advice on whistleblowing, protecting confidentiality, and being protected from reprisals at: [www.protect-advice.org.uk](http://www.protect-advice.org.uk). Protect is an independent UK charity that also offers an advice line (020 3117 2520).

## 17. COMPLAINTS AND GRIEVANCES POLICY

- 17.1 This policy applies to all Relevant Persons, as defined in Clause 2.2 of the Code of Conduct, who are not employees (and are therefore "Associated Individuals").
- 17.2 As set out in our Code of Conduct, we aim to promote the highest standards of conduct and demonstrate leadership in transparency, accountability and safeguarding.
- 17.3 Any employee who wishes to make a complaint should refer to the Employee Grievance Procedure in the relevant Employee Handbook. Any Third Party who wishes to make a complaint should be directed to the Third Party Complaints Procedure. Where you are unsure of the correct mechanism to

use, please request clarification from us. Where you have used an incorrect method, we will contact you to redirect your concern accordingly to whomever is best placed to respond to it.

- 17.4 As an Associated Individual we welcome your concerns, feedback or complaints and will seek to resolve these. We are committed to engaging our stakeholders and providing a means by which Associated Individuals can bring to our attention non-compliance with our Code of Conduct or policies, or breaches of any laws or norms that you believe we should be aware of.
- 17.5 This policy is to allow you an understanding of the process which we will follow to manage your concern and in no way limits or otherwise restricts your statutory rights.
- 17.6 If your concern relates whistleblowing, meaning the disclosure of concerns relating to suspected misconduct, illegal acts or failures to act, as set out in Clause 16.2 of the Whistleblowing Policy, please follow the procedure as set out in Clause 16 instead.
- 17.7 We do not tolerate the victimisation of anyone raising a genuine concern and anyone responsible for such conduct will be subject to disciplinary action. You may decide that you want to raise a concern in confidence. Therefore, if you ask for your identity to be protected, it will not be disclosed without your consent. If a situation arises where it is not possible to deal with the concern without revealing your identity (for instance because your evidence is needed in court or a disciplinary hearing), there will be a discussion as to whether and how we can proceed.
- 17.8 For the purposes of making a complaint or raising a grievance our preference is that:
- 17.8.1 you write to [complaints@sporthumanrights.org](mailto:complaints@sporthumanrights.org), where your complaint will be handled by the Chief Executive and Deputy Chief Executive. If you wish to submit your complaint anonymously you may do so at [www.sporthumanrights.org/complaints](http://www.sporthumanrights.org/complaints).
- 17.8.2 where your complaint relates to children or vulnerable adults, please write to [safeguarding@sporthumanrights.org](mailto:safeguarding@sporthumanrights.org), where messages will be conveyed directly to our Head of Safeguarding and Protection. If you wish to submit a safeguarding related complaint anonymously you may do so at [www.sporthumanrights.org/safeguarding](http://www.sporthumanrights.org/safeguarding).
- 17.8.3 if your complaint relates to the Chief Executive, Deputy Chief Executive or Head of Safeguarding and Protection, then you may write directly to the Chairperson of the Board of Directors at the postal address published on our website or by any other publicly notified means.

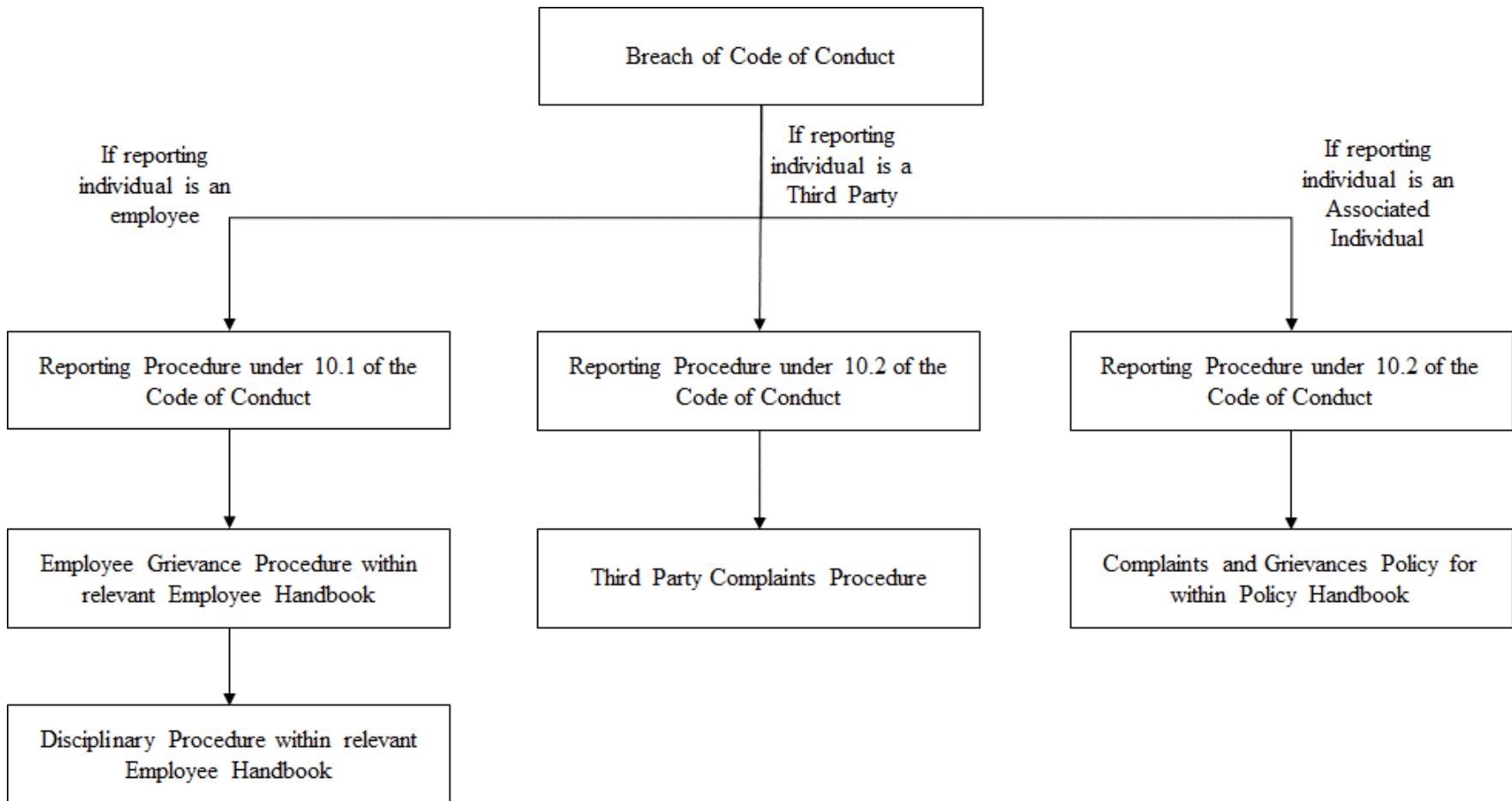
- 17.9 Every CSHR Director and member of Staff has a duty to report internally any complaints received from an Associated Individual in whatever form they arise.
- 17.10 If you contact us by any other means than set out in Clause 17.8 above, for example in person to a CSHR member of Staff, by post to our published office address, or by telephone to our published telephone number (both available on our website), then we cannot guarantee that we will be able to follow this procedure within the timeframes described, but we will make best efforts to do so. We would also prefer that you communicate your complaint to us in English, or if not then in French, but if you contact us in another language, we will make best efforts to translate and respond.
- 17.11 Notwithstanding Clause 17.7 above, if the information about which you become aware concerns harassment, bullying, discrimination or abusive conduct you are strongly encouraged to:
- 17.11.1 notify the offender that the offending conduct should immediately stop, if you feel comfortable doing so; and/or
- 17.11.2 if your request is ignored and the unwanted behaviour continues, or you feel unable to approach the offender, you should immediately contact the relevant contacts detailed in Clause 17.8 above to make a formal complaint.
- 17.11.3 Please note that if you pursue an anonymous route, we may lack information and therefore may be unable to fully investigate and rectify your complaint but will always do our best.
- 17.12 When reporting, if you have a concern about malpractice, it is asked that as much information as possible is provided to us. To the extent known, you should include, the date the alleged wrongdoing was identified, the nature of the concern and any supporting information, the names of any alleged wrongdoers and what action (if any) you are seeking from CSHR. If you have a direct or personal interest in the matter, you should also let it be known at this stage.
- 17.13 Following the reporting of any information by an Associated Individual under Clause 17.8 or 17.9 of this policy, the following procedure must be followed:
- 17.13.1 the Chief Executive, Deputy Chief Executive or another Staff member shall consider the complaint and may:
- (a) request further information;
  - (b) open an internal investigation;
  - (c) dismiss the complaint as vexatious and obviously untrue;

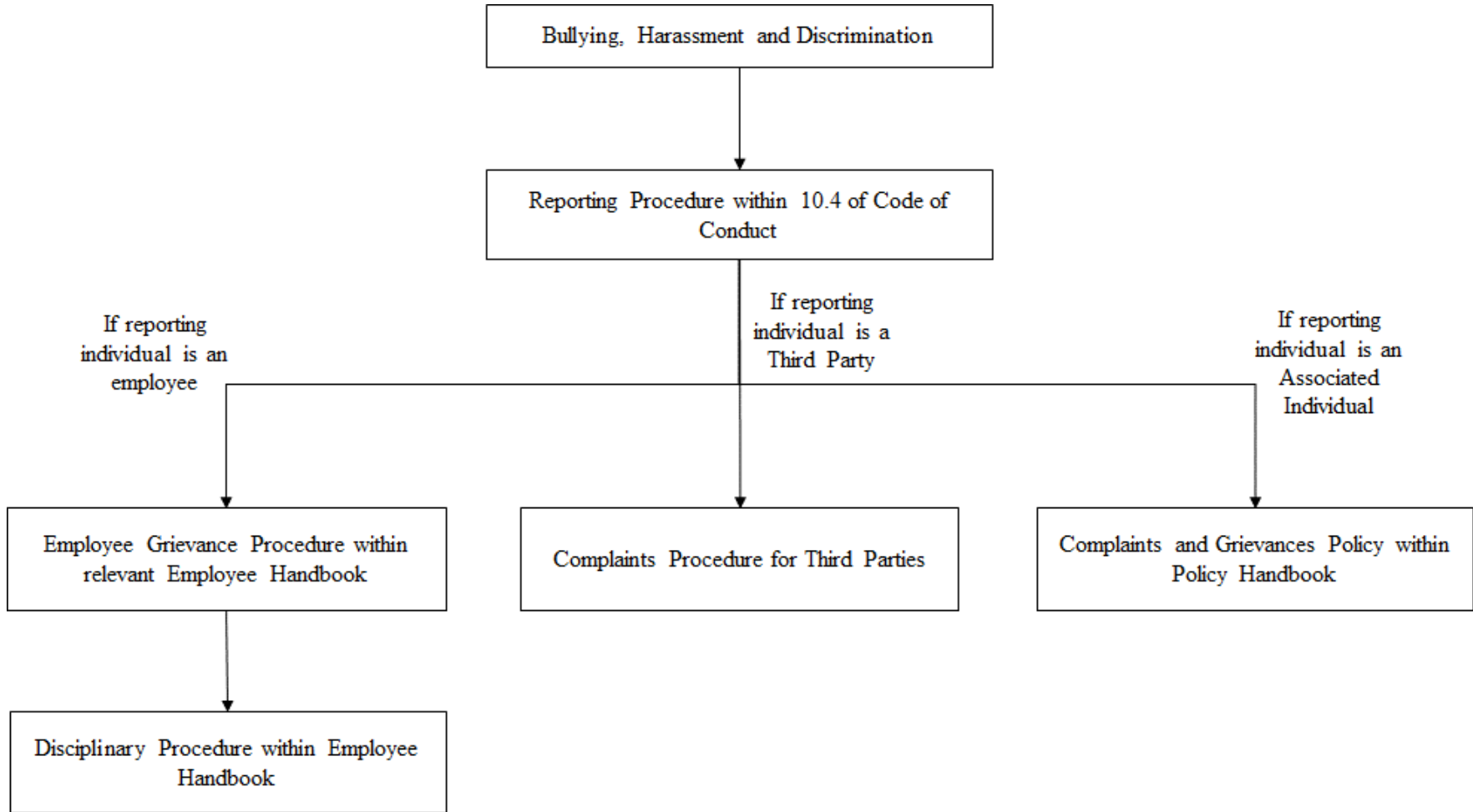
in the case of each event, we will write to you within fifteen days of receiving the complaint to outline the reasons for the decision and explain the process for a further review.

- 17.13.2 if we decide that the information provided reasonably warrants a formal investigation or you have asked for a review of our initial decision, we will appoint a member of Staff or external consultant to investigate the information provided by you;
- 17.13.3 once notified of who shall be investigating the complaint, if you are unhappy with the choice of member of Staff as you believe that there is a conflict of interest or the complaint will not be investigated fairly you have 3 days to set out in writing your objection to the Staff member appointed to investigate the complaint and the reasons why. A decision will be made as to whether to retain that member of Staff to investigate the complaint and will be communicated to you in writing within 7 days of receiving your objection. Any decision we make on this matter will be final and no further objections on the identity of the member of Staff investigating the complaint can be raised including if a replacement member of Staff is appointed. If we appoint an external consultant this objection process will be unavailable to you.
- 17.13.4 all Relevant Persons have an obligation to comply with and assist fully to the best of their abilities with any investigation we undertake unless they are restricted from aiding the investigation by law;
- 17.13.5 we shall provide you with updates in writing on the investigation at weekly intervals and shall inform you promptly in writing of any decision being made as to the outcome of the investigation and shall provide reasons for the decision when doing so;
- 17.13.6 in the event that the complaint is dismissed prior to an investigation taking place, you shall have 7 days to appeal the decision in writing. If this period lapses without an appeal being made, we will assume the matter resolved. If after an investigation has taken place and you wish to question the decision you are encouraged to consider statutory alternatives;
- 17.13.7 we retain our discretion as to the appropriate action to take if an investigation finds that there has been a breach of any policy or law. Actions we can take upon the investigation finding that there has been a breach include but are not limited to the termination of a working relationship with an Associated Individual and/or filing a criminal report in accordance with our Criminality Reporting Policy; and
- 17.13.8 where an affected person makes a request that their complaint be kept confidential you should not agree to this request but make it clear that you cannot promise confidentiality. If the affected person no longer feels comfortable making a complaint once they understand that

confidentiality cannot be promised you should direct them to the anonymised complaints procedure. We will endeavour to keep a complaint as confidential as possible where this has been requested but, in all circumstances, we retain all discretionary authority to report the complaint to the relevant authorities including but not limited to situations where we are legally obliged to do so. If we decide to report the complaint in spite of any request to the contrary, we will inform both you and the affected person in writing that we are doing so prior to any notification.

17.14 A summary of our complaints, grievances and whistleblowing channels can be found here:





Whistleblowing

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graph TD; A[Whistleblowing] --> B[Whistleblowing Policy in Policy Handbook]
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Whistleblowing Policy in Policy Handbook



## 18. DECLARATION OF GIFTS POLICY

- 18.1 The Code of Conduct requires you to declare any gifts (over the value of 50 CHF) or hospitality received in connection with your role or association with CSHR. Gifts may include per diems (except where authorised by your line manager) payment fees, financial assistance, services, privileges or favours.
- 18.2 In observing and respecting local hospitality conventions, you can accept small or token occasional gifts received.
- 18.3 What you should do with gifts:
- 18.3.1 Any Staff who receives a gift of any kind (other than a small token of appreciation) from an existing or potential business contact must disclose the fact of the gift, its nature and the identity of the sender to their line manager. If the gift is anything other than a small token of appreciation having no substantial financial value, the Staff will be required to return the gift to the sender with a polite note thanking them and explaining that it is CSHR's policy that Staff should not receive gifts.
- 18.3.2 If, in the opinion of the line manager, the gift might constitute a bribe or other inducement, the Staff will be asked to pass the gift to Chief Executive, who will return it to the sender with a suitable letter explaining CSHR's policy and asking that it be respected in the future.
- 18.3.3 In cases where the Staff's line manager agrees that the gift was sent to the employee as a token of gratitude for work carried out to a particularly high standard or for an exceptional level of service given, the Staff may, at the line manager's discretion, be permitted to retain the gift. Thus, small gifts that are genuinely given as a token of appreciation or gratitude will be acceptable, **provided that** the Staff properly declares the gift in line with this policy and **provided that** the Staff does not subsequently treat the person who sent the gift more favourably than others associated with CSHR.
- 18.4 If you have any doubt about a particular scenario, please speak to the Chief Executive or the Deputy Chief Executive for guidance. You should also read this policy in conjunction with the Anti-Bribery Policy below, with particular attention to when you must not offer gifts.

## 19. ANTI-BRIBERY POLICY

### 19.1 General Principles

- 19.1.1 CSHR is committed to conducting its business with complete integrity, and in a manner, which ensures compliance with all applicable laws and with the highest ethical standards. We use our best endeavours to ensure that all those acting on our behalf, whether they are

employees, consultants, third party intermediaries or agents, are aware of and share our commitment to conducting business ethically.

- 19.1.2 We also have an obligation to our employees and other stakeholders to comply with the highest standards of business ethics. These obligations include avoiding bribery and corruption, and implementing appropriate policies and procedures throughout our business operations that will inform our engagement with those who perform services for us or on our behalf.
- 19.1.3 Ethical behaviour can mean more than complying with the law but it starts with the law. You have an affirmative obligation to acquire sufficient knowledge of the laws that apply to you and your particular responsibilities and duties in order to recognise conduct or situations that raise legal or ethical questions and when to seek legal advice. It is management's obligation to ensure and facilitate adherence to our high standards of ethical conduct by clearly communicating these standards and ensuring their application by all personnel.
- 19.1.4 The purpose of this anti-bribery policy is to summarise CSHR's position in relation to ethical standards, including bribery, and to provide guidance in areas of particular concern. It does not address every potential type of conduct that may be unacceptable or illegal. The fact that a particular course of conduct is not specifically prohibited by this policy does not mean the act is acceptable and/or lawful. CSHR expects everyone working in partnership with, representing, or in association with CSHR and its subsidiaries around the world to aim, in good faith, to understand and comply with both the letter and the spirit of this policy and applicable laws.
- 19.1.5 Please contact the Chief Executive or Deputy Chief Executive if a situation arises that is not addressed in this policy, or where further advice is needed and keep this policy in a convenient place so you can refer to it in the future.
- 19.1.6 This policy is based on an assessment of the external and internal bribery risks that face us, and reflects fundamental standards that we expect those who perform services for us and on our behalf – including employees, consultants, the Trustees, the Governance Committee, Academy Faculty members, Research Fellows, third party intermediaries and agents – to abide by when acting on our behalf.
- 19.1.7 We will not use third parties or intermediaries to engage on our behalf in unethical practices that would be prohibited under applicable law – including the UK Bribery Act – if undertaken by us. We expect that all parties and intermediaries that we engage will conduct themselves accordingly when acting on our behalf or for our benefit.

- 19.1.8 We are committed to transparency on our ethical standards and anti-bribery initiatives and have established procedures that are described in this policy to permit employees to report instances or allegations of policy violations on a confidential or anonymous basis (to the extent that is consistent with applicable law).
- 19.1.9 The purpose of this policy is to ensure that CSHR and its employees comply with applicable national and international laws and standards in relation to anti bribery.
- 19.1.10 You must comply with this policy, even where local law is less onerous. Where local law is more onerous, you must comply with those laws in addition to this policy. Where there is, or may be, a conflict, you should consult the Chief Executive.

## 19.2 General prohibition

19.2.1 CSHR and each Relevant Person are prohibited from:

- (a) offering or giving a bribe to any person;
- (b) soliciting or receiving a bribe from any person; or
- (c) making a facilitation payment.

This prohibition applies in relation to all countries globally, irrespective of whether bribes are permitted or tolerated in those countries. Bribery is a serious criminal offence to which CSHR has zero tolerance.

19.2.2 You are required to:

- (a) comply with the highest standards whether that is under the terms of this policy or any applicable local laws and regulations;
- (b) comply with all policies that are part of CSHR's anti bribery programme;
- (c) be vigilant for any bribery within CSHR;
- (d) promptly notify the Chief Executive if you have any suspicions or knowledge that bribery is taking place within CSHR. Alternatively, you may contact regulatory and law enforcement bodies directly; and
- (e) have regard to your anti money laundering obligations.

19.2.3 Failure to comply with this Policy can result in one or more of the following:

- (a) serious financial and/or criminal penalties for CSHR;

- (b) criminal liability for individual Relevant Persons involved in bribery or with prior knowledge of bribery; and
- (c) if a Relevant Person, disciplinary action (which may result in the termination of your employment).

It is therefore imperative that all Relevant Persons comply with this policy. If you have any doubt about whether an activity is permitted you should consult the Chief Executive.

### 19.3 Implementation

- 19.3.1 This Policy is supported by the Directors. The Directors have delegated to the Chief Executive the authority and responsibility to oversee the implementation of this Policy.

### 19.4 Bribery

- 19.4.1 Bribery is the offer, promise, payment, transfer, request, agreement to receive or receipt of anything of value (financial or otherwise), whether directly or indirectly, at any time to or from any person (whether a private person, corporate entity, or Public Official), in order to induce that person (or any other person) to perform their roles improperly (or in the case of a Public Official in order to influence them with the intention of obtaining or retaining business in circumstances where this is not required or permitted by applicable law). A bribe can take the form of a "reward" and be paid after the improper performance of the relevant duty or obligation has taken place. For the avoidance of doubt, this also means that you do not need to have actually received the reward or inducement for it to amount to bribery.
- 19.4.2 It is a criminal offence and expressly prohibited to offer, promise, give or authorise a bribe (either directly or indirectly) as an inducement or reward for an action which is illegal, unethical or a breach of trust or duty. Inducements can take the form of gifts, loans, fees, rewards or other advantages (e.g. taxes, services, donations).
- 19.4.3 There is a risk that corporate entertainment, political contributions, charitable gifts, sponsorship and activities such as lobbying will be caught by applicable anti-bribery legislation.
- 19.4.4 Relevant Persons must also refrain from offering, promising, giving, authorising or accepting a bribe that they know or believe will breach the gifts and entertainment policy of a prospective third-party recipient or otherwise constitute the improper performance of a relevant function or activity of such third party.
- 19.4.5 The prohibition also applies to bribes offered, given, solicited or received through the use of intermediaries, such as agents, attorneys or any other third parties.

- 19.4.6 CSHR can also be guilty of a corporate criminal bribery offence pursuant to the UK Bribery Act 2010 where an associated person (i.e. person who performs services for CSHR, for example, an agent) pays a bribe whilst performing services for CSHR, to gain or retain business or an advantage and CSHR failed to put in place adequate procedures to prevent that bribe occurring. CSHR will have a defence if it has adequate procedures in place to prevent that bribery.
- 19.4.7 If you are in doubt as to what constitutes bribery, please contact the Chief Executive.

## 19.5 Public Officials

- 19.5.1 Bribing a Public Official is a serious offence and carries particular reputational and legal risks. The definition of Public Official is very broad and includes central and local government officials and employees of public agencies and state-owned enterprises. Dealings with Public Officials are particularly high risk because the threshold for prosecution is low and conduct that does not involve any improper behaviour by the Public Official can be caught.
- 19.5.2 It is prohibited to offer, promise or transfer a bribe to a Public Official (or to any other individual or any third party at the request or with the consent of a Public Official such as the Public Official's close family members or close business associates) in order to influence a Public Official and to obtain or retain business or a business advantage, unless it is specifically permitted under the terms of this policy or by applicable written law. It will be permitted under this policy if it has been approved by the Chief Executive.
- 19.5.3 Prohibited payments can include advantages or payments offered to influence a Public Official in anything he or she does in his or her official capacity, for example: (i) a representative of a state owned enterprise approving a contract; (ii) granting licenses related to operating activities; (iii) acting on tax matters, such as making payments to Public Officials in order to obtain preferential tax treatment for CSHR; (iv) making decisions in connection with governmental approval of a merger or acquisition; or (v) virtually any other action taken in an official capacity.
- 19.5.4 Advantages or payments are not bribes when the Public Official is required or permitted by applicable written law to be influenced by them.
- 19.5.5 Relevant Persons must ensure that they are particularly vigilant when dealing with Public Officials that they do not do anything which could be a breach of this policy or could be perceived as a breach of this policy.

- 19.5.6 If you are in doubt as to whether someone is a Public Official or not, err on the side of caution, and, where possible, seek further advice from the Chief Executive.

## **19.6 Dealings with Third Parties**

- 19.6.1 CSHR may become criminally liable (and/or suffer damage to its reputation) as a result of an act of bribery by persons or corporate entities which perform services for or on behalf of CSHR.
- 19.6.2 CSHR expects persons associated with it to act with integrity and to undertake their business without bribery.
- 19.6.3 Where appropriate, due diligence proportionate to the circumstances will be performed on associated persons to reduce the legal and reputational risk to CSHR. In addition, consideration will be given to the need for appropriate anti bribery measures in relation to associated persons, in particular, representations and warranties, anti-bribery declarations and/or monitoring.

## **19.7 Due Diligence**

- 19.7.1 In considering the need for and/or level and nature of due diligence appropriate, a number of risk-based factors may be taken into account. This should include, for example, (1) the nature of the transaction (e.g. involving Public Officials), (2) the jurisdiction in which the transaction is taking place, and (3) the reputation of the third party.
- 19.7.2 Where the checks carried out as part of the due diligence indicate bribery risks, enhanced due diligence should be undertaken, as explained in CSHR's Policy on Dealings with Third Parties.

## **19.8 Lobbying**

- 19.8.1 All lobbying activity (whether directly or through intermediaries) must be conducted without suggestion of bribery, conflict of interest or other impropriety. When using lobbyists, or when engaging former Public Officials, appropriate due diligence is to be carried out, and compliance with all relevant legislation, guidance and/or codes is essential. It is not appropriate to engage serving Public Officials to carry out political advocacy on behalf of CSHR.
- 19.8.2 You must comply with local laws and regulations on lobbying including registration and reporting requirements.

## **19.9 Charitable Gifts and Sponsorship**

It is important that philanthropic and charitable donations and philanthropic and commercial sponsorship are free from any suspicion of bribery, whether direct or indirect. You must ensure that such activities are not made as an

inducement for the purpose of obtaining any improper advantage or favour. Therefore, charities, organisations or individuals seeking charitable gifts and/or sponsorship (excluding Relevant Persons for personal charitable activities) are subject to appropriate due diligence.

## 19.10 Gifts and Hospitality

19.10.1 In some circumstances, gifts or hospitality may be considered to be bribes under applicable anti bribery law.

19.10.2 Giving or receiving hospitality (including meals, accommodation and transport) is permitted **provided that** the hospitality is not provided for an improper purpose and the nature, style and tone of any hospitality is reasonable in the circumstances and could not be perceived as lavish, disproportionate, or inappropriate.

19.10.3 Relevant Persons must not:

- (a) accept a gift or hospitality where you consider that the person offering the gift or hospitality intends to influence improperly a business decision, or other action, that you are due to take, or perform, or to reward you improperly in relation to a business decision or action;
- (b) offer a gift or hospitality where you intend to influence improperly a decision that the person receiving the gift or hospitality is due to make regarding the business of CSHR;
- (c) offer hospitality which you know, or believe, to be in excess of what the recipient is permitted to receive. If in any doubt, you should take steps to ascertain whether the recipient is permitted to receive the entertainment you propose.

19.10.4 Particular care must be taken when giving gifts or hospitality to Public Officials.

19.10.5 Before accepting or offering any gift or entertainment, you must consider whether the gift or hospitality could reasonably be perceived to be inappropriate. If so, you must not accept or offer that gift or entertainment.

19.10.6 You must follow the procedures set out in the Declaration of Gifts policy (Section 8) for declaring gifts and hospitality. Before offering or accepting gifts or hospitality, check to find out if you need prior approval. Reimbursement for agreed expenses on gifts and hospitality will only be paid on proof of expenditure, e.g. receipt or invoice. Expenditure on hospitality and gifts must be documented.

## 19.11 Facilitation Payments

- 19.11.1 A common example of bribery are facilitation or "grease" payments. These are typically payments made for the purposes of facilitating or accelerating an action by a Public Official, for example, a payment to a customs official to speed up the release of goods from a customs warehouse, where the payment is outside of the usual process. Another example might be a cash payment to a government official to ensure that an application is approved more quickly than under the usual approval process. These types of payments are bribes and are strictly prohibited.
- 19.11.2 You must avoid being put in a position where you might be asked to make or accept a facilitation payment on our behalf. You must also avoid being put in a position from where it could be inferred that such a payment was available.
- 19.11.3 If anyone asks you to make a payment on behalf of CSHR, you must consider carefully whether what they are asking for is in proportion to the goods or services involved. Always get a receipt, and if you have any concerns you must discuss them with your line manager immediately.

## 19.12 Record Keeping and Monitoring

- 19.12.1 The Chief Executive is responsible for recording all reports made under this policy, including a record of the investigation and the outcome of those investigations. The Chief Executive is also responsible for monitoring the implementation of, and ongoing compliance with, this policy.
- 19.12.2 Where appropriate and after consideration, CSHR (or a body or function to which it delegates such responsibility) will investigate reported allegations of bribery involving or in any way connected to CSHR. CSHR will then consider what action to take as a result of such investigations, including, where applicable, disciplinary actions against Relevant Persons (up to and including dismissal), termination of relationships and reports to relevant governmental authorities or regulators.
- 19.12.3 The Chief Executive will share relevant data from any reports to the Board of Directors. Therefore, to assist this report, you must keep written records of any gifts or hospitality you have given or received, and declare these in accordance with this Handbook. All associated expenses claims must give full details of the reason for the expenditure and must be submitted in line with this Handbook and the Employee Handbook.



19.12.4 Invoices and other records relating to third-party dealings, must be accurate and complete. You must never maintain 'off-book' accounts to conceal or facilitate payments of any kind.

19.12.5 How do I report suspicions of Bribery?

- (a) If you have any suspicions of bribery at CSHR, or of bribes being paid by any person associated with CSHR, you must notify your line manager or the Chief Executive.
- (b) CSHR has a strict prohibition on retaliation against Relevant Persons who either make good faith reports or who participate in the investigation of a report of suspected misconduct. Any Relevant Person who engages in retaliation is subject to disciplinary action by CSHR, including termination of employment.

19.12.6 What are the penalties for breaching the Policy?

- (a) Bribery is a criminal offence in the countries which CSHR operates in, and you could face imprisonment and/or serious financial penalties. Either you or CSHR could also face civil action as a result of partaking in bribery. If you breach this policy, it could also lead to CSHR being convicted of failing to prevent bribery, or being debarred from bidding on public procurement contracts.
- (b) Any deliberate breach of this Policy by you will lead to disciplinary action (which may result in the termination of your employment with CSHR).
- (c) Employees should read this policy in conjunction with the Anti-Bribery section of the relevant CSHR Employee Handbook.

### 19.13 Anti-Bribery Policy Definitions

19.13.1 "CSHR" means the Centre for Sport and Human Rights group, which for the avoidance of doubt, and for the purpose of this anti-bribery policy and includes:

- (a) any of its businesses, functions and other organisational structures globally; and
- (b) any of its subsidiaries which are 50 per cent. or more owned subsidiaries;

19.13.2 "Government Authority" means:

- (a) a national government, political subdivision thereof, or local jurisdiction therein;

- (b) an instrumentality, board, commission, court or agency, whether civilian or military, of any of the above, however constituted;
- (c) a government owned or government controlled association, organisation, business or enterprise;
- (d) a political party; or
- (e) a public organisation, being an organisation, whose members are (i) countries or territories; (ii) governments of countries or territories; and/or (iii) other public international organisations, including and without limitation: The World Bank, the United Nations, the International Monetary Fund and the Organisation for Economic Cooperation and Development;

19.13.3 "Public Official" means:

- (a) an employee, officer or representative of, or any person otherwise acting in an official capacity for or on behalf of, a Government Authority;
- (b) a person holding a legislative, administrative or judicial position of any kind, regardless of whether elected or appointed;
- (c) an officer of, or individual who holds a position in, a political party;
- (d) a candidate for political office;
- (e) an individual who holds any other official, ceremonial or other appointed or inherited position with a government or any of its agencies;
- (f) an individual who exercises a public function for or on behalf of a country or territory or for any public agency or public enterprise of a country or territory; or
- (g) an official or agent of a public international organisation (such as the World Health Organisation).

## 20. CRIMINALITY REPORTING POLICY

20.1 CSHR upholds all laws in the jurisdictions in which it operates. This includes a duty on CSHR to report known criminal offences committed by any member of its Staff or knowledge of criminality associated with its dealings with third parties.

20.2 In the event that you become aware of any criminal activity, including in relation to children or vulnerable adults, you should raise this with your line

manager, or if inappropriate for you to do so, you should raise this with the Chief Executive or the Deputy Chief Executive.

- 20.3 We will not conduct an investigation into criminality on its own accord but will instead inform the relevant authorities and assist in providing evidence in our possession to the relevant authorities where requested to do so.
- 20.4 Where an affected person makes a request that their complaint be kept confidential you should not agree to this request but make it clear that you cannot promise confidentiality. If the affected person no longer feels comfortable making a complaint once they understand that confidentiality cannot be promised you should direct them to the anonymised complaints procedure. We will endeavour to keep a complaint as confidential as possible where this has been requested but, in all circumstances, we retain all discretionary authority to report the complaint to the relevant authorities including but not limited to situations where we are legally obliged to do so. If we decide to report the complaint in spite of any request to the contrary, we will inform both you and the affected person in writing that we are doing so prior to any notification.
- 20.5 Where any allegations of criminality are raised against you, you must make your line manager aware of this immediately.
- 20.6 Where allegations of criminality are raised against any Staff, CSHR will support you to the extent possible through this. However, your responsibilities and activities may require review based on any allegation and your line manager (where relevant) or point of contact will be available to discuss this with you on a case by case basis.

# CONTACT

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CLIFFORD  
CHANCE



Centre for Sport  
& Human Rights