HEALTH, SAFETY AND SECURITY POLICY

This policy describes the health, safety and security principles and practices that apply to all employees, board members and consultants involved in IMPACT work, in all locations and at any time. This policy should be read in conjunction with IMPACT’s Crisis Management Policy, IMPACT’s Travel Policy and IMPACT’s Security Management Plans.

IMPACT will make every effort to provide a healthy, safe and secure work environment. All staff must be dedicated to the continuing objective of reducing the risk of injury to staff. IMPACT, as employer, is ultimately responsible for staff health, safety and security. It is in the best interest of all parties to consider health, safety and security in every activity. Commitment to health, safety and security must form an integral part of this organization, from the Board to staff and consultants.

Security is defined as the protection of IMPACT staff and assets from violence, theft and other identifiable risks. Security is achieved when staff are safe, and perceive themselves as being safe, relative to an assessment of the risks to them and the organisation in a particular location.

PURPOSE
The purpose of the Health, Safety and Security Policy is to provide employees in all IMPACT programs / offices with a basis from which to build their security and personal safety tools and clarify where responsibility lies for safety and security issues at IMPACT.

BENCHMARK
IMPACT is able to operate safely and securely in all chosen program locations with uninhibited access to beneficiaries as defined in IMPACT’s Strategic Plan.

THRESHOLD
IMPACT’s approach to managing risk is one of risk management rather than risk aversion. Our mission, programs and operating locations inherently involve exposure to insecurity and the risk of violence. Our tolerance to taking risks will always take into account our strategic objectives, as well as the impact of other strategic factors (e.g. program criticality, impact of key relationships, donor interests). Nevertheless, IMPACT believes in the primacy of human life, which means IMPACT’s staff will not be expected to risk their lives or health in order to protect IMPACT’s activities, property, finances or reputation.

The whole text of the present Policy, as well as the documents derived from it, have been written in French and English, both versions being deemed authentic, but for legal purposes the text in English is to be given priority of interpretation.
APPROACH

IMPACT’s approach to safety and security consists of several integrated components and aims to be incorporated into all aspects of its work. This approach will be outlined in the Security Management Plans.

KEY SECURITY PRINCIPLES

A principle of good health, safety and security management is that risks must be identified and mitigation measures put in place that will reduce the impact or likelihood of threats. However, it is recognized that it is not possible for IMPACT to eliminate all risks associated with IMPACT’s work in IMPACT project areas. IMPACT’s tolerance for risk may vary depending on the context, based on the strategic need of the activity.

IMPACT will always consider the wellbeing of partners, the communities and community members with whom it works. IMPACT will never knowingly develop security plans or implement procedures\(^1\) which endanger or act contrary to the interests of those communities.

IMPACT values the skills and experiences of a diverse workforce and the different needs of individuals. It is acknowledged that in some locations a diverse workforce may have an impact on security and this will be considered when deciding on personal security management.

IMPACT endeavours to conduct an open dialogue with employees on health, safety and security matters. IMPACT will provide individuals with appropriate specialist advice, support, information and resources they need to make appropriate decisions about their personal safety and security.

Individuals will not be compelled to undertake work in locations where a thorough risk assessment has indicated that their security is in question or where the individual perceives the security risk to be unacceptable and provides justification to this effect.

Failure of IMPACT employees to follow management instructions with regards to safety and security will be classed as gross misconduct and dealt with as a disciplinary matter.

IMPACT is committed to ensuring that board members, staff and partner organisations have the necessary skills, information and experience to enable them to manage the risks to security and health and safety at work. The organisation will provide the necessary training and resources to support this principle.

IMPACT is committed to understanding donor duty of care requirements, as well as to implementing the necessary procedures and mitigation measures in order to achieve those requirements.

\(^1\) See “Implementation Guidance Tools (IGT) for the Voluntary Principles on Security and Human Rights”
RESPONSIBILITIES
IMPACT has a duty of care to ensure, so far as is reasonably practicable, the health, safety and security of its employees, board members, consultants and interns engaged on IMPACT business.

IMPACT’s Board of Directors has ultimate responsibility for this Policy, the security management system, and will review and agree to the organisation’s threshold of acceptable level of risk at least annually.

The Board of Directors will receive a summary of any reported internal incidents and near misses at each Board meeting.

Responsibility for the operational management of health, safety and security rests with IMPACT’s Executive Director as a delegated authority from the Board of Directors.

The responsibility for travel to regional operations will lie with the relevant Director of Field Operations. In country, this responsibility sits with the relevant IMPACT Project Managers / Representatives.

Direct supervisors will be held accountable for the health and safety of staff under their supervision and that staff work in compliance with established safe and secure work practices and procedures.

The Security and Logistics Coordinator (SLC) will ensure that context-specific health, safety and security management processes are developed and in place in each program. The SLC will also track, monitor and analyse security incidents across the different programs and inform and advise senior management on any trends or emerging threats.

Security Assistants (SAs) in country will report to the Security and Logistics Coordinator and the Director of Field Operations, and are responsible for the coordination of the day to day operational management of health, safety and security issues for all staff and visitors in their country / areas of operation.

All IMPACT staff are partly responsible for their personal health, safety and security and should exercise common sense to ensure their own safety and security.

SAFETY AND SECURITY COMPONENTS
Training will be provided as appropriate for individual duties. Those travelling to and working in insecure environments should receive basic personal security training. Those with security responsibilities in the field will receive security management training.

Context-specific Security Management Plans will be developed to support employees with security management responsibilities; the security management plans will be approved by the Director of Field Operations and the Executive Director to ensure adequate and consistent health, safety and security
practices and procedures are in place across the organisation. Security Management Plans will be reviewed on an annual basis, or more frequently if needed.

In Country Security Risk Assessments (SRAs) and Standard Operating Procedures (SOPs) will be developed, and reviewed by each country program on an annual basis, or more frequently if needed.

An Incident Reporting System will be developed and maintained for staff to report incidents which may affect their health, safety or security, or that of others and may lead to a revision of IMPACT’s security information and procedures; all staff are responsible for reporting any internal\(^2\) incident or near miss to the local Security Assistant and to the Security and Logistics Coordinator. Staff are encouraged to report any relevant external\(^3\) incidents to the Security Assistant who will in turn report to the Security and Logistics Coordinator.

The Security and Logistics Coordinator will in turn report internal incidents or near misses to the Director of Field Operations and the Executive Director.

A Crisis Management Team will respond to serious incidents / events that require organisation-wide coordination and management. IMPACT defines a crisis as an unexpected incident or event that seriously threatens the organisation, its assets and / or its reputation which would require an extraordinary organisational response both during and after the event.

Crisis management is the process by which the organization deals with a crisis, which cannot be handled through conventional security management systems. It requires the use of internal coping and reporting mechanisms that are inherently different from those when the organisation is in business-as-usual mode.

SAFETY IN THE WORKPLACE
IMPACT will make arrangements for safe and secure facilities for each IMPACT office, with a physical space that offers a productive working environment, provides access to users and colleagues while maintaining the capability to prevent intrusion from undesirable elements.

The presence of firearms, weapons of any type or armed personnel in any IMPACT vehicle is strictly prohibited unless approved in advance by the Executive Director.

IMPACT will use armed escorts as a last resort, or when required by local authorities where this has been approved in advance by the Executive Director, or if there is an immediate threat to the safety and security of staff and prior approval is not possible due to the nature of the threat to staff.

\(^2\) Internal incidents are events that have an actual impact on IMPACT staff, assets or reputation (for example a vehicle theft, a road traffic accident).

\(^3\) External incidents are events that may have an impact on the security situation in IMPACT’s operational area, and thus demand a review of existing procedures by way of response (e.g. a change in government, targeting of another NGO in a country of operation: all of these incidents may well demand changes in your own procedures).
It is the responsibility of all direct supervisors to guard against the use of unsafe equipment and unsafe work methods in their areas of responsibility and to require the development and observance of good safety habits.

It is the responsibility of all employees to immediately report any indications that the work environment is not being maintained in a safe and secure fashion to their direct supervisor.

All staff should become familiar with all exits and emergency escape routes, in IMPACT offices and in field-based accommodation. Employees should also be familiar with the location and use of fire extinguishers on the premises (where available).

In Ontario all staff must complete the “Health and Safety Awareness Training for Workers” as soon as possible after commencing employment. Once complete, a copy of the Completion Certificate should be provided to the individual’s direct supervisor. The training can be found here: https://www.labour.gov.on.ca/english/hs/training/workers.php

Use of drugs or alcohol in the workplace
It is the responsibility of both IMPACT and its employees to maintain a safe, healthy and efficient working environment. Drugs and alcohol are, therefore, not allowed in the workplace and staff are strictly prohibited from working while under the influence of drugs or alcohol.

IMPACT will not tolerate staff working under the influence of drugs or alcohol, and any staff member who is found to be impaired in the course of his / her employment will be subject to discipline up to and including termination of employment for just cause.

Exceptions to this policy may be made for specific work-related events or circumstances. Such exceptions will be communicated in advance of the event or circumstances.

IMPACT is not concerned with personal activities unless such activities adversely affect a staff member’s job performance or compromise his/her security.

EVALUATION AND REVIEW
IMPACT is committed to ensuring that this policy is a useful and current tool and therefore undertakes to carry out a formal review of the policy and related documents / guidance periodically and not less than annually. IMPACT will respond to social and political situations as and when they occur ensuring that staff have the most current and valid information to inform their decisions.