



United Nations Global Compact

## Communication on Engagement

October 2018

Creative Associates International

This report outlines Creative Associates International's activities in support of the United Nations Global Compact between the periods of July 2015 to October 2018.

**PART I: STATEMENT OF CONTINUED SUPPORT BY CHIEF EXECUTIVE OFFICER**

October 19, 2018

To our stakeholders:

I am pleased to confirm that Creative Associates International reaffirms its support to the United Nations Global Compact and its Ten Principles in the areas of Human Rights, Labor, Environment and Anti-Corruption. This is our Communication on Engagement with the United Nations Global Compact. We welcome feedback on its contents.

In this Communication of Engagement, we describe the actions that our organization has taken to support the UN Global Compact and its Principles as suggested for an organization like ours. We also commit to sharing this information with our stakeholders using our primary channels of communication.

Sincerely yours,



Leland Kruvant  
President and CEO

## PART II: DESCRIPTION OF ACTIVITIES

Creative Associates International (Creative) provides on-the-ground development services in the fields of education, workforce development, youth employment, citizen security, governance, technology for development, and more. As a member of the UN Global Compact, Creative forges lasting partnerships with corporations and local organizations in more than 85 countries around the world. Creative is committed to upholding the Ten Principles of the UN Global Compact through our programs, partnerships, and internal systems. Below is a description of our activities as they relate to the areas of human rights, labor, environment, and anti-corruption.

### 1. Human Rights

One of Creative’s core values is “respect for one another,” which is critical in achieving our mission “to support people around the world realize the positive change they seek.” It also drives our efforts to respect and support human rights through internal policies and program activities. Since 1977, Creative has worked in fragile and conflict-affected areas and has seen first-hand the detrimental impacts on individuals and communities when human rights are not upheld. Creative’s programs and policies reflect bedrock human rights principles, several of which are particularly relevant to the Compact.

The Compact’s “Children’s Rights and Business Principles” calls on members to meet their responsibility to respect and support children’s rights, including the right to education. Since its founding, Creative has been a leader in expanding quality basic education to children and youth around the world, often in conflict or post-conflict countries. In the USAID-funded **Northern Nigeria Education Initiative Plus** program, Creative improves access and quality of education for more than 2 million school-aged children and youth in three northern states. Creative’s **Afghan Children Read** program builds the capacity of the Ministry of Education to provide an evidence-based early grade reading program (in Dari and Pashto) for students in Grades 1 to 3 in both formal and community-based education schools. Creative also works in Ethiopia through the USAID **READ II** program to improve the reading proficiency of 15 million Ethiopian children. The positive impact of these programs depends on strong partnerships that Creative has forged with local and international partners, many of whom are UN Global compact members, including the International Rescue Committee, Viamo, and World Vision International.

Creative has also established a **Child Protection Policy**, which prohibits all personnel and consultants from engaging in child abuse or exploitation and includes a prohibition against commercial, transactional, labor, or other exploitation resulting in actual or potential harm to the child’s health, well-being, survival, development, or dignity. Under this policy, the welfare of the child is paramount, and all children, whatever their age, culture, ability, gender, language, racial origin, religious belief and/or sexual identity, are to be protected and their welfare safeguarded in activities in which Creative is involved. In addition, Creative is committed to take seriously and respond swiftly and appropriately to all reasonable suspicions or allegations of poor treatment or abuse.

Finally, Creative’s **Code of Conduct** broadly reflects well-established human rights and ethical principles. For example, Creative’s Code of Conduct values diversity and inclusion; works to prevent harassment and discrimination; promotes a safe and healthy workplace; and protects personal information. Creative is also expanding its training program around these and other ethical behavior policies.

### 2. Labor

Over the course of 40 years, four women entrepreneurs grew Creative into a dynamic international development company with more than 1,300 diverse and experienced professionals around the world. Creative is committed to upholding the Compact’s principles on labor and maintaining a safe and



empowering workplace for all its employees in headquarters and the field. The principles of eliminating discrimination in respect of employment and occupation and the abolition of child labor are particularly relevant to Creative's programs and policies.

Creative has established a robust set of policies to prevent unfair or discriminatory employment practices. These include policies for equal employment opportunities, anti-discrimination, worker health and welfare provisions, ethical worker behavior, conflict of interest, anti-harassment, ensuring a non-hostile workplace, and others. Creative also uses tools and methods, such as localized gender assessments and audits, to better understand the needs of male and female staff in a given context, ensure meaningful participation and representation of women in program staffing, and identify strategies to address barriers and norms that may negatively affect staff from minority groups.

In recent years Creative has established several policies to ensure child protection and safety in its global programs. Under its **Anti-Trafficking Policy**, Creative strictly prohibits a range of actions associated with human trafficking during program implementation, including severe forms of trafficking in persons; procuring commercial sex acts, and using forced labor in the performance of the contract. Creative also seeks to prevent trafficking through training programs, raising awareness, and promoting a culture of anti-trafficking among those hired or retained by Creative. In addition, if Creative personnel receive information that trafficking has been or may be occurring, it conducts a thorough investigation, determines the appropriate action to address any instances of inappropriate behavior, up to and including, termination of employment, and may withhold payments and/or terminate sub awards, grants, or procurements that are non-compliant with anti-trafficking regulations.

Creative's economic growth programs honor the right to economic self-determination, embedded in the International Covenant on Economic, Social and Cultural Rights. Creative supports the active participation of women and minority groups and the protection of children. In the USAID-funded **Afghanistan Workforce Development Program**, Creative harnessed gaps in private sector demands, created gender-sensitive work environments, and offered positive feedback loops for gender integration to achieve a 38% female enrollment rate for skills training courses. Creative's **Nigeria Education Crisis Response** program collaborated with another UN Global Compact member to provide adolescent girls with basic vocational education and seed capital to begin their small businesses. A Creative workforce development project in Asia supports ethnic minority groups and highly prioritizes women in senior leadership of the project, such that seven of the eleven staff are women. From 2013 to 2017, Creative implemented the **Combating Exploitative Child Labor in Morocco- Promise Pathways** program with three international organizations and a network of local organizations to reduce child labor, assist youth of legal working age to secure decent work, and provide household members (aged 18 and older) with opportunities for improved livelihoods in rural and peri-urban areas of the Marrakesh-Tansift-Al Haouz region of Morocco.

### 3. Environment

The UN Global Compact challenges businesses to undertake initiatives to promote greater environmental responsibility and consciousness. Creative recognizes the importance of designing sustainable development programs for implementation, but also the importance of practicing environmental consciousness in its day-to-day operations. As recommended by the Compact, Creative plans to draft and enact environmental policies with sustainability targets and indicators for its internal operations.

Creative strives to contribute to sustainability efforts by employing green practices in our daily operations. Creative's headquarters is located in an environmentally friendly building with energy



conservation mechanisms, such as automatic light and HVAC shut-downs at the end of the work day and weekends. Toner cartridges are recycled, paper shredding is conducted through vetted safe-shredding certified vendors, and technological waste is disposed responsibly. Creative has also opted to use bean-to-cup coffee machines instead of coffee pods to significantly reduce plastic consumption. Creative complies with the United States 1995 Paperwork Reduction Act, and reduces environmental waste by recycling paper, glass, and aluminum. An information and communications infrastructure is in place to minimize travel by enabling staff to host meetings via Skype for Business, WhatsApp, or Zoom.

Creative implements select USAID programs that require contractors to promote sound and sustainable environmental practices throughout the program's core activities. During start-up, Creative reviews program activities in the context of the Initial Environmental Examination (IEE) prepared for the activity. When a country-level IEE does not exist, Creative supports USAID in developing a supplemental IEE to the project's specific activities and context. Based on the threshold determinations and conditions of the IEE for each relevant project, Creative submits an Environmental Mitigation and Monitoring Plan (EMMP) as part of the initial work plan that guides implementation. Creative's management approach for such projects outlines the effective use of institutional arrangements such as sub-awards and sub-grants to achieve project results. Creative includes environmental compliance language in all sub-grants and sub-awards, and ensures subcontractors and grantees integrate appropriate environmental compliance requirements, such as integrating country IEE conditions into program work plans, ensuring allocation of appropriate resources, and regularly screening and reporting on appropriate elements of environmental compliance. Creative regularly trains grantees and/or subcontractors to increase their capacity to implement the relevant requirements of the country IEE. Creative also budgets appropriate resources to implement environmental compliance and mitigation activities, including project environmental management expertise and mitigation measures.

Recently, Creative has expanded its development work into programs that foster improved environmental stewardship and sustainability. For example, in Honduras, Creative implements the ***Alianza para E Corredor Seco/Alliance for Dry Corridor*** program, which enhances the human capital, resilience, and livelihoods of 6,000 poor and extreme poor families in twelve municipalities in the dry corridor—one of the most impoverished and climate-fragile environments in the country. Through a workforce development program in Asia, Creative is improving sustainable livelihoods of historically discriminated ethnic groups, providing these communities with the skills and knowledge to thrive in a growing market economy.

#### 4. Anti-Corruption

Creative as a company has a demonstrated track record of taking steps to ensure that it is vigilant against corruption, misconduct, and conflicts of interest. Creative recently implemented a new broad anti-corruption policy applicable to all Creative personnel worldwide. It is also Creative policy to comply with all applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act ("FCPA") and the local laws in every country in which we do business. FCPA mandates that companies establish and maintain accurate books and records and sufficient internal controls. FCPA applies to all employees of Creative, including officers and directors. In addition, Creative will require third parties who represent the company (such as agents, consultants, and contractors) to conduct themselves in a manner consistent with this policy.

Creative conducts formal and informal vetting for all employees and partners to ensure that no client funds go to blacklisted individuals, compliance with client-mandated rules and regulations, and an appropriate understanding of performance and reputation. Creative uses the Visual Compliance Database system to check more than 50 watch lists, including HM Treasury Consolidated List, United



Nations Consolidated List, and Interpol Recently Wanted. Creative's Security Department develops project-specific Vetting Plans adapted to each program requirements.

In addition, all staff are briefed on, and required to sign, Creative's **Code of Conduct** and conflict of interest policies. Creative has also developed specific training on the Code that employees take on an annual basis. If project staff are found to be engaged in corrupt activities, we remove those individuals from the project in a careful and culturally sensitive way. In all cases, we inform the client immediately if an allegation has been raised or suspicions arise, and work with the client to resolve the issue for the integrity of the program. Creative requires employees to disclose any suspected or actual cases of conflict of interest in which they may be involved or witness. If called for, Creative introduces third parties to ensure unbiased reviews.

Creative also recently established a **Whistleblower Policy** that informs Creative's employees of their statutory whistleblower rights and protections. The policy provides that it is contrary to the values of Creative for any employee to retaliate against anyone who reports an allegation or violation in good faith, reports an ethics violation or a suspected violation of law, fraud/waste/abuse, or violation of any regulation governing the operations of Creative. An employee who retaliates against someone who has reported an allegation or violation in good faith is subject to discipline up to and including termination of employment.

Pursuant to Creative's **Reporting of Fraud, Allegations of Fraud and Misconduct Policy**, Creative's Security Office administers the receipt, review, and investigation and ensures proper disposition of all allegations of fraud and misconduct. Any allegation regarding a Creative employee or other relevant party involving violations of law, government regulations, or Creative standards of conduct must immediately be reported to the Team Lead via the program specific hotline or to Creative's Security Office Fraud and Abuse direct lines, via email, or online.

### PART III: MEASUREMENT OF OUTCOMES

Creative is a results-oriented organization that uses evidence-based programming to promote the UN Global Compact's mission and principles. Below are examples of Creative-led programs that have achieved positive results in the areas of human rights, education, and labor.

- The **Northern Nigeria Education Initiative (NEI)** was implemented in 20 Local Government Education Authorities (10 per state), 120 formal schools, and 80 non-formal learning centers. The project supported in-service and pre-service training of 5,685 teachers and educators, surpassing the project target by 53%. NEI also reached 1,422,925 children, resulting in 33% increase in enrollment during the life of the project.
- The **Nigeria Education Crisis Response** program, was implemented in Adamawa, Bauchi, Gombe and later expanded to Yobe and Borno states. It brought accelerated basic education and psychosocial support to more than 80,000 children whose futures would have otherwise been put on hold through more than 1,400 non-formal learning centers established throughout the life of the project.
- The **Afghan Workforce Development Program** has awarded over 108 grants, ranging from \$150,000 to 250,000, to more than 74 local organizations for skills training activities. Since 2012, AWDP has trained 34,778 participants and placed 22,530 in new or better jobs. The program has also exceeded targets for female participation in trainings and employment outcomes: a total of 7,989 women have gained new or better employment (as of December 2017). AWDP has awarded more than eight grants to female-owned groups focused on improving women's workforce skills, and raising awareness about gender-sensitive workplace barriers.
- The **Alianza para E Corredor Seco/Alliance for Dry Corridor (AJH)** program has established and strengthened a combined total of 46 Outreach Centers that have benefitted more than 22,000 youth with English, ICT, and life skills instruction in Honduras. Through more than 100 partnerships with the private sector, AJH trained at-risk youth and former gang members in skills for income-generating activities.

On August 13, 2018, Members of Creative's external relations and business development teams attended the UN Global Compact Network USA reception to welcome the Board of Directors and fellow Network USA members. Creative plans to continue participating in local and global Compact events, such as the upcoming regional meet-up on Gender Equality in San Francisco and planned quarterly member meetings. Creative will also promote the Compact's principles and membership through its local and international partnerships and publicize its involvement with the Compact through multiple channels of communication.