



WFD

COMMUNICATION ON ENGAGEMENT (COE)

Period covered by this communication on Engagement:

From: 14 April 2021 To: 13 April 2023

Part I. Statement of Continued Support by the Chief Executive Officer

13 April 2023

To our stakeholders:

I am pleased to confirm that the Westminster Foundation for Democracy (WFD) reaffirms its support to the United Nations Global Compact and its Ten Principles in the areas of Human Rights, Labour, 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 organisation has taken to support the UN Global Compact and its Principles as suggested for an organisation like ours. We also commit to sharing this information with our stakeholders using our primary channels of communication.

Sincerely yours,

Anthony Smith
Chief Executive Officer

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Part II. Description of Actions

WFD is a non-departmental public body with headquarters in the UK and offices in 27 countries around the world. Therefore, using the UNGC classification, we are a public sector organisation. As the UK's leading organisation dedicated to supporting democracy, our work is strongly aligned with the objectives of the UNGC and, more broadly, the Sustainable Development Goals (SDGs).

WFD's vision is of a world in which freedom and democracy thrive, and where inclusive and accountable governments serve people fairly and effectively. WFD's mission is to contribute to this long-term vision by mobilising British and international expertise to support people around the world to strengthen democracy in their country. We help them address problems their citizens face while building long-term democratic resilience.

To achieve this mission, WFD strengthens the capacity of key democratic institutions – including parliaments, political parties, CSOs, and electoral bodies – helping ensure they have the systems, knowledge, and skills to perform effectively. WFD also fosters improved democratic processes, bringing together individuals and institutions and encouraging them to work together to solve concrete problems, applying democratic values and practices.

All our work is underpinned by WFD's four values of accountability and integrity, excellence, people-focus, and being mission-oriented.

We believe in open, inclusive, representative, accountable, responsive, multi-party political systems.

1. Implementation of the UN Global Compact's Ten Principles through our strategy and operations

- a) WFD directly addresses a number of the Ten Principles as key themes of our programming with parliaments, independent institutions, political parties, and civil society organisations. During the reporting period, we developed and launched WFD's Strategy for 2022-2025. The Strategy identifies a number of technical and thematic areas we expect to be 'democratic pinch points' during these three years and beyond. We are committed to maintain and further strengthen professional expertise in these areas, so that we can help provide the tools, information, environment, and approach for complex problems to be solved locally. Of most relevance to the UN Global Compact's Ten Principles are: Accountability and Transparency; Democratic Action on Climate and the Environment; Women's Political Leadership; Inclusion and Equality of Participation.

An internal communication plan is in development to ensure enhanced awareness of the UN Global Compact and its Ten Principles across the organisation.

- b) WFD continues to be committed to the **Labour** and **Human Rights** principles in the UNGC. All UK-based WFD staff continue to have the opportunity to join the Public and Commercial Services (PCS) Union, and are actively encouraged to do so. Regular meetings continue to be held between union representatives and senior leadership within the organisation. Staff from across the organisation are consulted on key human resources and labour-related issues and policy changes.

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WFD's Modern Slavery Policy details WFD's no tolerance approach and provides staff with clear guidance on what is expected of them and the processes WFD has put in place to reduce the risk through our supply chain. During the reporting period, WFD developed training on Modern Slavery which was rolled out within the organisation in 2022 through a Learning Essentials session on Managing Compliance in an Increasingly Complex World. WFD's due diligence process for both upstream and downstream partners provides assurance that WFD is not engaged with any forms of modern slavery. All new staff are provided with a briefing during the induction process, and further refresher training is planned during the next reporting period.

The nature of WFD's political inclusion work, notably around women's political participation and leadership, persons with disabilities, LGBT+, and young people, promotes advancement of equality of opportunity and the fostering of good relations.

WFD has in place an Equal Opportunities Policy and continues to ensure the recruitment process is fair and transparent. Appropriate adjustments are made to the interview process and/or tests for applicants with disabilities, and for successful candidates to enable them to deliver their work. Refresher unconscious bias training is planned for 2023.

During the reporting period, WFD introduced an Outstanding Organisation Strategy. A key component of this is the reinforcement of our commitment to equity, diversity and inclusion (ED&I). This includes introducing greater accountability through increasing transparency of ED&I data and performance. We will also develop and implement training, governance, and risk and assurance mechanisms to embed inclusion into all strategic and operational areas of the organisation. This will include a new Equity, Diversity & Inclusion Opportunity Review Tool for staff to apply when developing and introducing new organisational processes, policies and systems, designing programmes, or managing organisational projects (i.e. change programmes). The tool will provide 'nudges' for staff to consider the impact of their initiatives through an ED&I lens and ensure equity and inclusion principles are being upheld.

WFD is currently implementing a Management Development Programme for managers within the organisation. This includes a specific module on managing diversity.

WFD's Code of Conduct gives clear guidance on the expectations of staff, experts and consultants, and implementing partners (including sub-contractors and sub-grantees) of the standards expected of them when working with WFD. This includes a specific requirement to contribute to a positive workplace environment built on mutual respect. During the reporting period, WFD undertook a wellbeing assessment, involving individual and group consultations, anonymous survey, and discussions with WFD's Leadership Team. Key recommendations were developed, and have been incorporated into a wellbeing plan, which is currently being implemented.

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During the reporting period, WFD increasingly worked with vulnerable groups in implementation of our activities. WFD continues to utilise, strengthen and reinforce a range of tools to assist programme teams to identify safeguarding risks at the design stage, and integrate safeguarding into the development of programmes and specific activities to enable safeguarding risks to be reduced as far as possible in implementation of WFD's work. During the reporting period, WFD developed a tailored e-learning safeguarding course, which is accessible to all WFD staff and downstream partners. Undertaking the training is mandatory for WFD staff, and forms part of the induction process. Refresher online/virtual training on Reporting a Safeguarding Concern was also provided to all staff in November 2022.

WFD continues to reinforce these ethical standards through our sub-contracts and sub-grants, which incorporate WFD's Code of Conduct and Safeguarding Policy, together with an obligation to comply with international labour standards promoted by the International Labour Organisation, including in relation to child or forced labour, and work towards compliance with the Ethical Trading Initiative and applicable living wage standards.

- c) WFD is committed to ensuring all aspects of its work in the UK and overseas are managed sustainably. Across our offices we address our **environmental impact** across three main areas: energy management, waste management, and transport. We will continue to work towards improving our environmental performance, careful use of resources, and minimising adverse environmental impact. WFD is committed to complying with all applicable UK and local environmental legislation.

WFD's headquarters is located in a UK public building which is subject to an ongoing Government Offices Net Zero Programme and a set of Greening Government Commitment Targets. WFD has in place an Environmental Policy, which incorporates energy efficiency and, where possible, WFD provides facilities for recycling waste.

WFD's main impact on the environment is through international travel undertaken in the course of delivering our work. Compared to pre-pandemic levels of international travel, WFD estimates that in 2021-2022 international travel by air decreased by about 90% resulting in a significantly reduced carbon footprint. During the last 12 months, with COVID-19 restrictions lifting, international and domestic travel undertaken by WFD staff and contracted experts has increased, although this is still at a significantly lower level than pre-pandemic. During the reporting period, WFD introduced a new Safe and Sustainable Travel Policy to establish a policy principle that, as we transition out of the pandemic, international travel should only be undertaken where it is "necessary" and carried out in a way that is "environmentally-aware". The policy also sets out guidance to encourage the greenest method of travel is booked, which is supplemented by arrangements agreed with and enforced by our travel management company.

In March 2021, WFD was awarded a Bronze Certificate in recognition of its 'Tread Lighter Index' rating. WFD is committed to continuing to take steps to further reduce its environmental impact, which is a core element of its Environmental Policy and its Safe and Sustainable Travel Policy.

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- d) WFD continues to strengthen its processes to reflect our commitment to **Anti-Corruption**. Our Code of Conduct includes agreement by staff and downstream partners to comply with WFD's Anti-Fraud, Bribery and Corruption Policy, and Anti-Terrorism Policy, and to conduct themselves in a manner that avoids conflict of interests. New joiners, whether staff or Board members, are briefed on WFD's Code of Conduct, conflicts of interest, and key policies as part of their standard induction. WFD provides training for all new staff on these requirements and all new starters are required to complete the Doing Business Without Bribery online course. We also have in place a Gift and Hospitality Policy, which all staff are required to adhere to.

WFD maintains a Register of Board Members' Interests, which is revised annually. Senior management within WFD (the Leadership Team) also complete a declaration of interests annually. Each year every Country Office completes an annual declaration confirming any actual or potential conflicts of interest involving suppliers or grantees and any member of staff in the country office have been disclosed to WFD London and recorded in a declaration of conflicts of interest form.

WFD's In-Country Operating Manual sets minimum operating standards (MOS) for the set up, running and closure of a WFD country office. This ensures quality and consistency across WFD offices, and that WFD complies with the law and donor requirements. Compliance with the MOS is assessed through an annual Country Office Controls Self-Assessment, which evaluates the office's adherence to WFD's minimum operating standards, and disclose whether there have been any non-compliance incidents (e.g. fraud, theft, bribery, anti-terrorism) in the office, provide details on any such incidents, and confirm that WFD London was informed at the time of the incident, triggering a review by WFD senior officials and internal audit as appropriate.

With guidance from the UK Foreign, Commonwealth & Development Office (FCDO), WFD has adopted a Counter Fraud & Corruption Action Plan that emphasises deterrence, encourages prevention, promotes detection, ensures effective investigations and applies sanctions as appropriate.

Refresher training on counter fraud was provided for staff in May 2022. A mandatory Fraud and Corruption Awareness Learning Essentials session is scheduled for April 2023.

2. Encouraging our partners to participate in the UN Global Compact

- a) Through our work with the UK's Foreign, Commonwealth & Development Office (FCDO), WFD has been complying with and continuing to embed their Supply Partner Code of Conduct into our work. As part of this, we make our downstream partners aware of the UNGC. We continue to raise awareness of good ethical conduct through our engagement with partners. In our previous Communication of Engagement, we reported that our sub-contracts and sub-grants include enhanced specific provisions on ethical behaviour, what is expected of downstream partners and their staff, and provisions for sanctions should ethical standards fall below what is expected. Our sub-contract and sub-grant templates are reviewed on at least an annual basis to ensure they

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remain robust and reflect latest legal best practice, compliance requirement, and reflect WFD policy revisions. All our sub-contracts and sub-grants include our policies on: Anti-Fraud, Bribery and Corruption; Reporting Concerns (Whistleblowing); Safeguarding; Anti-Terrorism; and Procurement. WFD's Code of Conduct is also included in the sub-contracts and sub-grants. By signing the sub-contract or sub-grant, downstream partners agree to abide by the contents of the policies and code of conduct. Organisations are provided with a link to an e-learning training course on bribery and corruption. As noted above, during the reporting period WFD developed a tailored e-learning Safeguarding course, which is made available to our downstream partners. WFD is also currently developing further training for downstream partners, which will include values and code of conduct, conflicts of interest, cyber security, key WFD policies, and an introduction to UNGC principles.

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Part III. Measurement of Outcomes

As outlined in Part II, as the UK's leading democracy support organisation, our work is strongly aligned with the objectives of the UNGC and, more broadly, the Sustainable Development Goals (SDGs).

Participants and Experts

In our previous Communication on Engagement, we reported on the establishment of WFD's bespoke monitoring and evaluation system, the Evidence and Impact Hub (EIH), which is used to provide up-to-date information regarding progress on programmes across our portfolio of interventions. The EIH also provides data on the number and sex of participants in WFD's work. This enables us to reflect on how our programmes are implemented and undertake deep dive reviews as necessary. During the reporting period, WFD gathered and analysed data on participants and experts engaged. Of those who declared, 52.99% of participants identified as female, 46.97% identified as male, and 0.05% identified as other. Our data shows that, of those who declared, 43.05% of experts identified as female, 56.79% identified as male, and 0.15% identified as other.

In October 2021 WFD was awarded the contract to recruit, select and mobilise UK election observers for OSCE election observation missions (EOMs). WFD is committed to increasing the diversity of candidates and selected observers. Between October 2021 and April 2023, equal numbers of female and male observers were deployed.

Vetting Checks

In the last two years we have undertaken vetting checks on 2,565 individuals and organisations.

Due Diligence Checks

In the last two years we have undertaken due diligence of approximately 600 organisations and individuals.

Safeguarding Awareness

125 staff have undertaken WFD's tailored Safeguarding e-learning course over the last two years. A Safeguarding Learning Essentials session was also provided for all staff at the end of 2022.

Anti-Fraud, Bribery and Corruption Awareness


Refresher training on counter fraud was attended by 56 members of staff in May 2022. All new starters are required to complete the Doing Business Without Bribery online course. A mandatory Fraud and Corruption Awareness Learning Essentials session is planned for April 2023.

Management Development Programme

71 managers through the programme since it start in June 2020, and 30 managers have participated in the programme in the last 2 years (since April 2021).


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