



**CENTRE FOR DEVELOPMENT
— IN SOCIAL JUSTICE —**
A People-Centered Development

CENTRE FOR DEVELOPMENT IN SOCIAL JUSTICE (CDSJ)

HUMAN RIGHTS POLICY



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A People-Centered Development

1. Title

This instrument shall be known as the **CDSJ Human Rights Policy**.

2. Effective Date

This Policy takes effect on the date of approval by the competent governance authority of CDSJ and remains in force until amended or repealed.

3. Purpose

This Policy sets the rules for how CDSJ understands, applies, promotes, protects, and monitors human rights across its governance, programmes, partnerships, employment practices, advocacy, research, community engagement, procurement, and institutional conduct.

This Policy is adopted because human rights are not only part of CDSJ's public mission. They must also govern how CDSJ behaves internally, how it treats staff and communities, how it designs programmes, how it works with partners, and how it exercises power. It is not enough for CDSJ to speak about rights in public while operating unfairly, unsafely, or discriminatorily in practice. This Policy therefore translates the organisation's rights-based identity into clear institutional duties. It states what standards CDSJ must follow, who is responsible, what decisions must be checked for rights impact, and what action must be taken where rights concerns arise.

4. Application

This Policy applies to:

- a. all CDSJ governance structures;
- b. all CDSJ staff, whether permanent, temporary, fixed-term, seconded, or part-time;
- c. all interns, fellows, volunteers, consultants, associates, and other associated personnel;
- d. all programmes, projects, advocacy actions, research activities, community engagements, partnerships, and institutional processes conducted in the name of CDSJ;
- e. all offices, branches, and future country operations of CDSJ; and
- f. all partners, sub-grantees, consultants, and service providers where compliance with CDSJ human rights standards is incorporated into a contract, grant agreement, code of conduct, or other binding instrument.

This Policy applies both internally and externally. Internally, it governs how CDSJ treats people within the organisation. Externally, it governs how CDSJ designs and delivers work affecting communities, participants, partners, and the public.

5. Policy Statement

CDSJ is a human rights-based organisation. All CDSJ work must therefore be planned, implemented, supervised, and reviewed in a way that respects human dignity, equality, non-discrimination, participation, accountability, safety, and access to remedy.

No CDSJ programme, action, partnership, internal process, or institutional decision may knowingly violate human rights, create avoidable harm, or undermine the rights and dignity of the people with whom CDSJ works or the people who work within CDSJ.

All staff, governance members, associated personnel, and relevant partners must act in ways that:

- a. respect the inherent dignity and equal worth of all persons;
- b. avoid discrimination, exclusion, demeaning treatment, and abuse of power;
- c. protect confidentiality, safety, and informed participation where rights-sensitive information is involved;
- d. support participation of affected persons in decisions that concern them; and
- e. respond appropriately where rights violations, exclusion, or harmful practices are identified.

6. Human Rights Standards Binding on CDSJ

For purposes of this Policy, CDSJ recognises and commits itself to the following minimum human rights standards in all its work:

- a. equality before the law and equal treatment;
- b. freedom from discrimination;
- c. dignity and bodily integrity;
- d. freedom from violence, abuse, exploitation, intimidation, and degrading treatment;
- e. participation in decisions affecting one's life, work, or wellbeing;
- f. access to information necessary for meaningful participation;
- g. confidentiality and respect for private and sensitive information;
- h. fair process and access to complaint or remedy mechanisms;
- i. protection of children and adults at risk from harm;
- j. special attention to the rights of historically marginalised or excluded persons and communities; and
- k. accountability for misuse of authority, rights abuse, retaliation, or exclusion.

This list is not exhaustive. Where CDSJ operates in a context governed by additional constitutional, statutory, regional, or international rights obligations, the organisation must comply with those standards as well.

7. Core Human Rights Commitments

CDSJ commits to the following institutional rules:

7.1 Non-Discrimination

No person may be excluded, treated unfairly, denied service, denied opportunity, humiliated, or disadvantaged in a CDSJ process because of sex, gender, age, disability, health status, social status, nationality, race, ethnicity, language, religion, marital status, political opinion where protected by law, sexual orientation, gender identity, or any other protected ground recognised by applicable law.

7.2 Equality and Inclusion

All CDSJ programmes and internal systems must be designed to reduce barriers to participation and access, especially for women, children, youth, persons with disabilities, LGBTQI+ persons where legally and operationally relevant, rural communities, poor communities, and other marginalised groups.

7.3 Dignity and Respect

Every person interacting with CDSJ must be treated with dignity, respect, and professional fairness. Humiliation, degrading treatment, verbal abuse, intimidation, and dismissive treatment are prohibited.

7.4 Participation

Where CDSJ programmes, decisions, or research activities affect people directly, CDSJ must create reasonable opportunities for those affected to participate, provide input, raise concerns, or give feedback.

7.5 Accountability

CDSJ must maintain practical systems for complaint, feedback, grievance, reporting, and response where people allege harm, exclusion, unfair treatment, or rights abuse.

7.6 Do No Harm

CDSJ must identify and reduce risks of harm that may arise from its own programming, research, communications, advocacy, staffing decisions, partnerships, or operational conduct.

7.7 Confidentiality and Privacy

Rights-sensitive information must be handled carefully, especially where disclosure may expose a person to stigma, retaliation, violence, loss of livelihood, legal risk, or other harm.

7.8 Access to Remedy

Where a person's rights are affected by CDSJ conduct or a CDSJ-controlled process, CDSJ must provide or facilitate access to an appropriate complaint, grievance, referral, disciplinary, safeguarding, or corrective process.

8. Human Rights Duties in Governance and Management

8.1 Governance Duty

Governance structures must ensure that CDSJ policies, budgets, strategic choices, and oversight arrangements do not undermine the organisation's human rights commitments.

8.2 Executive Duty

The Co-Executive Directors must ensure that human rights standards are built into staffing, partnerships, programmes, operations, and institutional decisions.

8.3 Management Duty

Managers must identify rights risks in their units, address harmful behaviour, prevent exclusionary practice, and escalate serious rights concerns promptly.

Human rights responsibility is not confined to programme staff or legal staff. It applies to leadership, finance, HR, procurement, communications, and operations. A rights-based organisation can violate rights through budgeting, silence, poor supervision, bad data handling, inaccessible systems, or informal abuse of authority just as easily as through overt public misconduct. For that reason, this Policy places responsibility across the institution and not only in one department.

9. Human Rights in Employment and Workplace Practice

CDSJ must apply human rights standards in all employment-related processes, including:

- a. recruitment and selection;
- b. onboarding and induction;
- c. supervision and performance management;

- d. promotion and access to training;
- e. disciplinary and grievance handling;
- f. remuneration and benefits administration;
- g. health, safety, and staff wellness; and
- h. termination and exit processes.

The following specific workplace rules apply:

- a. no staff member may be humiliated, threatened, insulted, or demeaned in the course of management or supervision;
- b. no staff member may be denied a fair hearing where a grievance or disciplinary matter affects them;
- c. managers must apply policies consistently and not selectively;
- d. staff with disabilities or special access needs must be provided reasonable accommodation where feasible and lawful; and
- e. retaliation against any person for raising a rights-related concern is prohibited.

10. Human Rights in Programme Design and Delivery

Every CDSJ programme, project, or field activity must be designed and implemented in a way that protects rights and reduces harm.

At minimum, programme leads must ensure that:

- a. the intended beneficiaries or participants are identified fairly and transparently;
- b. exclusion risks are considered at planning stage;
- c. participation methods are appropriate to the people involved;
- d. referral mechanisms are in place where the programme may surface harm, violence, trauma, or protection needs;
- e. staff interacting with communities understand basic conduct standards; and
- f. community-facing complaint or feedback options are available where relevant.

A programme may not pursue delivery targets in a way that justifies abusive engagement, unsafe data collection, coercive participation, false consent, or exclusion of vulnerable persons without recorded justification.

11. Human Rights in Research, Documentation, and Knowledge Work

Where CDSJ conducts research, evidence generation, assessments, case documentation, storytelling, monitoring, or learning work, the responsible team must ensure that:

- a. participation is voluntary where required;
- b. the person understands the purpose of the engagement where appropriate;
- c. confidentiality is explained and respected;
- d. identifying details are not disclosed without proper basis;
- e. children and vulnerable persons are not interviewed or documented without the required safeguards;
- f. sensitive information is stored securely; and
- g. the use of data or stories does not expose the person to avoidable stigma, retaliation, or harm.

Where rights-sensitive content will be used in advocacy or communications, the relevant programme lead and communications lead must review the protection implications before publication or dissemination.

12. Human Rights in Communications and Advocacy

CDSJ communications, public statements, campaigns, and advocacy outputs must respect the dignity and rights of the people represented.

The following rules apply:

- a. no one may use images, names, stories, or case details in a way that dehumanises, exploits, sensationalises, or exposes a person to unnecessary risk;
- b. images or narratives of children, survivors, or vulnerable persons require heightened care and compliance with the relevant safeguarding and consent rules;
- c. public messaging must not reinforce harmful stereotypes, stigma, or hate; and
- d. staff may not claim to speak for affected communities in a way that erases their participation or misrepresents their views.

Advocacy is not rights-based if it uses people's experiences carelessly. The story of injustice must not be told through a method that creates another injustice. For that reason, this Policy requires that dignity and protection remain central even where the public interest case for advocacy is strong.

13. Human Rights in Partnerships and Funding Relationships

Before entering into a major partnership, grant relationship, consortium role, or sub-granting arrangement, CDSJ must consider whether the partner's conduct, known record, operating model, or expected activities create a material human rights risk.

Where risk is identified, CDSJ must do one or more of the following:

- a. set rights-related conditions in the agreement;
- b. require adherence to CDSJ policies;
- c. require corrective measures before engagement proceeds;
- d. monitor the partner more closely; or
- e. decline the partnership.

CDSJ may not knowingly continue a partnership where there is serious ongoing abuse, exploitation, discrimination, retaliation, or rights harm and no credible corrective action is being taken.

14. Human Rights Screening of Major Decisions

The following decisions must include a basic human rights check before approval:

- a. new programme design;
- b. high-risk research activity;
- c. advocacy campaigns involving named individuals or communities;
- d. major partnership or consortium agreements;
- e. sub-granting to community-based or third-party actors;
- f. operating in high-risk environments;
- g. major communications outputs involving vulnerable individuals; and
- h. any other activity identified by management as likely to carry material rights risk.

The human rights check must ask at least:

- a. who may be harmed or excluded;
- b. whether participation is meaningful;
- c. whether confidentiality and safety are protected;

- d. whether a complaint or referral route exists; and
- e. whether any group is likely to be disadvantaged by design or delivery.

15. Human Rights Complaints and Reporting

Any person who believes that CDSJ conduct, staff conduct, programme delivery, communications, partnership practice, or internal management action has violated their rights or the rights of others may report the concern through the appropriate CDSJ mechanism.

Depending on the facts, the matter may be handled under:

- a. the Grievance and Complaints Handling Policy;
- b. the Whistleblower Protection Policy;
- c. the Safeguarding Policy;
- d. the Child Protection Policy;
- e. the Sexual Harassment Policy;
- f. the Disciplinary Policy; or
- g. another relevant internal or external process.

A rights complaint may not be ignored on the basis that it is “too political,” “too sensitive,” or “bad for the organisation.” Once raised, it must be recorded and routed.

16. Immediate Escalation Cases

The following matters must be escalated immediately and may not be handled as ordinary low-level complaints:

- a. credible risk of physical harm or violence;
- b. safeguarding risk involving a child or vulnerable adult;
- c. ongoing discrimination causing serious exclusion or harm;
- d. retaliatory action against a reporting person;
- e. unlawful detention, threats, or coercion connected to CDSJ work;
- f. serious confidentiality breach exposing a person to danger; and
- g. any other case where delay is likely to increase harm.

17. Human Rights Responsibilities by Role

17.1 Executive Committee and Governance Structures

These structures must oversee whether CDSJ governance and strategy remain consistent with this Policy and must act where major rights risks, serious rights complaints, or repeated institutional failures are reported.

17.2 Co-Executive Director – Operations and Technical Services

This office shall ensure that operational systems, HR processes, disciplinary handling, records management, and office administration comply with this Policy.

17.3 Co-Executive Director – Programmes and Partnerships

This office shall ensure that programme design, delivery, advocacy, community engagement, partnership management, and research processes comply with this Policy.

17.4 Programmes Directors and Unit Leads

Programmes Directors and unit leads shall conduct basic rights checks on their work, prevent exclusionary practices, respond to concerns raised by communities or staff, and escalate serious rights issues promptly.

17.5 All Staff and Associated Personnel

All staff and associated personnel shall:

- a. treat others with dignity;
- b. avoid discriminatory or abusive conduct;
- c. protect sensitive information;
- d. respect complaint and feedback processes; and
- e. report rights-related concerns promptly.

18. Minimum Human Rights Documentation Requirements

Where a rights-sensitive activity is planned or reviewed, the file should contain, where relevant:

- a. participation or consultation records;
- b. risk notes or planning notes;
- c. referral pathway information;
- d. consent or information-sharing records where applicable;
- e. complaints or feedback records; and
- f. any mitigation measures required.

CDSJ does not need to create unnecessary paperwork for low-risk routine work, but rights-sensitive work must leave an evidence trail showing that risk and dignity were considered.

19. Human Rights Breaches

A breach of this Policy includes:

- a. discriminatory treatment;
- b. degrading conduct;
- c. avoidable exclusion from a CDSJ process;
- d. retaliation for raising rights concerns;
- e. knowingly exposing a person to avoidable rights-related harm;
- f. disclosing rights-sensitive information without lawful basis;
- g. suppressing a rights-related complaint; or
- h. failing to act on a known serious rights risk.

Where a breach is established, CDSJ may take corrective, disciplinary, contractual, governance, safeguarding, or legal action depending on the seriousness of the matter.

20. Corrective Measures

Where a rights concern or breach is identified, CDSJ may take one or more of the following actions:

- a. change the process or decision that caused the concern;
- b. apologise or issue corrective communication;
- c. provide a reasonable accommodation or access adjustment;
- d. revise programme design or delivery arrangements;
- e. refer the person to support or protection services;
- f. train or coach the staff involved;
- g. initiate disciplinary action;
- h. suspend or end a partnership or activity; or
- i. report to an external authority where legally required.

The purpose of corrective action is not only to respond to the immediate case, but to stop repetition. A rights-based institution must learn from each breach and change the relevant system, not simply close the file. Where a complaint shows a pattern, the relevant manager must review whether the underlying procedure, staff conduct, or programme design needs adjustment.

21. Time Requirements

The following minimum time requirements apply:

- a. a rights complaint or concern must be acknowledged or routed within **3 working days**;
- b. a complaint misfiled under the wrong policy must be redirected within **2 working days**;
- c. serious rights-risk matters requiring urgent escalation must be acted on immediately and no later than the same working day where possible; and
- d. rights-risk screening for major decisions must be completed before final approval of the relevant activity or arrangement.

22. Record-Keeping and Confidentiality

All rights-related complaints, reviews, referrals, and major rights-risk decisions must be documented and stored securely.

Access must be limited to those with a legitimate operational or oversight need. No one may disclose rights-sensitive complaint information casually, publicly, or beyond the need-to-know circle.

All rights-related records must be retained in accordance with the Records Management and Document Retention Policy and any specific protection requirement in another policy.

23. Non-Compliance with this Policy

Failure to follow this Policy includes:

- a. ignoring a rights-related complaint;
- b. refusing to route a rights issue to the correct process;
- c. retaliating against a complainant or witness;
- d. knowingly approving a programme or action with unmanaged serious rights risk;
- e. failing to apply required confidentiality; or
- f. repeatedly operating in a discriminatory or exclusionary way.

Any such failure may lead to corrective instruction, disciplinary action, governance action, or review of the relevant programme, decision, or partnership.

24. Country Operations Clause

This Policy applies across all CDSJ operations.

Where a country of operation requires additional constitutional, statutory, labour, child protection, anti-discrimination, access to information, or administrative protections, CDSJ shall issue a country annex. The country annex may add requirements but may not reduce the minimum rights standards in this Policy unless mandatory local law requires a different formulation.

25. Related Instruments

This Policy shall be read together with:

- the Constitution of CDSJ;

- the CDSJ Policy Framework;
- the Board Governance and Oversight Charter;
- Code of Conduct and Ethics Policy;
- Grievance and Complaints Handling Policy;
- Disciplinary Policy;
- Safeguarding Policy;
- Child Protection Policy;
- Sexual Harassment Policy;
- Whistleblower Protection Policy;
- Records Management and Document Retention Policy;
- Data Protection, Privacy, and Confidentiality Policy; and
- any approved rights screening tools, complaint forms, or country annexes.

26. Review

This Policy must be reviewed at least once every three years, or earlier if required by legal change, governance direction, repeated rights-related complaints, programme review findings, or country expansion.

27. Approval

Approved by: Adv. Motlatsi J Mofolo
Approving Authority: Director and Boards Ex-Officio
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