Elohim-foundation Environmental and Social Safeguards Policy

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Document Control

The Resource Mobilization co-leaders will be responsible for the periodic review of this document.

Document Responsibility

Title	Elohim Foundation Environmental and Social Safeguards Policy
Directorate	Innovation, Investment and Impact
Unit	Resource Mobilization
Manager	Resource Mobilization co-leaders
Applicable to	All staff

Document Revision History

Version	Endorsed By	Approved By	Meeting Reference	Date Approved	Effective Date	Sections Modified
1	Management Team	Common Board of Trustees	CB 12	12 August 2026	1-Dec-26	New Policy

BACKGROUND:

Elohim Foundation was formerly known as The Carpenter's Foundation International, a non-for-profit development and humanitarian organisation founded on the 13th September, 2001 in Abuja –Nigeria. The foundation is the brainchild of Dr. Ibecheole, Julius a physically challenged Nigerian, set out to tackle the challenges of human family preservation through socio-economic intervention.

The Foundation was registered with Cooperate Affairs Commission as a non-for-profit organisation on the 29th April 2002 five years after it started operation in Egbu Owerri, Imo State on 27th of August, 1997. Following its registration, the foundation officially got inaugurated in Abuja on the 13th of September, 2001. And in 2006 its operational office in Niger state was established.

In 2005, 2010 and currently in 2024 Elohim Foundation has gone through strategic structural and program reviews by external consultant development firms with intent to strengthen its operational capacity, efficiency, productivity and impact in line with its broad goals and objectives while keeping in tune to emerging trends.

Elohim Foundation therefore is a system-based organisation with a history of best practices rooted through its dynamic operational policies and regulations, providing evidenced based services to a wide range of clients across Nigeria using dynamic strategic approaches such as partnerships, social movements, advocacy, right based approach, inclusivity, evidence based, research and conferencing.

GOAL

To contribute to the sustainability of the human community through eradication and impact mitigation of conflict and socio-economic challenges while promoting human capacity development.

VISION

Intact family for Sustainable human society.

MISSION

To provide intervention services that addresses the challenges of conflict and sustainable human society, through people centred approaches in both development and humanitarian setting.

1. Purpose

1.1. Elohim Foundation affirm that environmental and social sustainability is a cornerstone for an equitable world where all people have viable livelihoods supported by healthy and productive landscapes. Elohim Foundation is committed to ensuring the social and environmental sustainability of the projects in which they are Elohim Foundation Anti-Bribery, Anti-Corruption Practices, Anti-Money Laundering and Anti-Terrorist Financing Policy. engaged. The present Environmental and Social Safeguards (ESS) Policy is a step in that direction.

1.2. Elohim Foundation projects must not have adverse effects on human well-being, equity and environment Elohim Foundations Policy is based on principles which are overarching, reflect Elohim Foundation unique characteristics, and are broadly applicable for any Elohim Foundation project. The overarching principles of Elohim Foundation safeguards are as follows:

1.2.1. **Precautionary Approach**: Elohim Foundation applies a science-based, precautionary approach to its project design and implementation. Where there are threats of serious or irreversible damage, lack of full scientific certainty should not be used as a reason for avoiding cost-effective measures to prevent environmental degradation.

1.2.2. **Human Rights-Based Approach (HRBA):** Elohim Foundation Safeguards Policy is founded on a human rights-based approach to project management, including the rights of future generations. This means that stakeholder engagements and public participation from the project preparation to closure should be based on the following procedural human rights principles:

1.2.2.1. **Equality and Non-discrimination**: All individuals are equal as human beings by virtue of the inherent dignity of each human person. All human beings are entitled to their human rights without discrimination of any kind, such as race, color, sex, age, language, religion, political or other opinion, national or social origin, disability, property, birth or other status.

1.2.2.2. **Participation and Inclusion**: Every person and all peoples are entitled to active, free and meaningful participation in, contribution to, and enjoyment of civil, economic, social, cultural and political development in which human rights and fundamental freedoms can be realized.

1.2.2.3. **Accountability and Rule of Law**: This requires accessible, effective, and independent mechanisms and procedures of redress based on appropriate judicial and administrative mechanisms.

1.6. Elohim Foundation ESS Policy serves four broad purposes:

2. Scope:

2.1. This is a Elohim Foundation wide Policy and is applicable to all staff and project implementation partners located in all countries where Elohim Foundation operates.

2.2. The ESS Policy is intended to cover the development and implementation of projects that Elohim Foundation undertake or support henceforth, not current or past activities. There are three main foci for the ESS Policy:

1. **Elohim Foundation programmers and projects**. These are the core of our work and comprise three components, namely: a. **Project Appraisals and Risk Assessment**;

   b. C**ompliance monitoring and assessment**; and

   c. **Stakeholder Communications Channel**. Project appraisals and risk assessment relate to the identification and management of environmental and social risks and impacts and are applied before or at the start of a project, while compliance monitoring and assessment sustains risk management activities throughout the project duration. The stakeholder communications channel, which applies before, during, and perhaps even after a project is concluded, involves a system for stakeholder participation and engagement with the organization. Currently, a Whistle Blowers Platform is in place but would need to be adapted to meet the ESS requirement.

2. **Elohim Foundation corporate policies and strategies**. These are the longer term and longer acting forces within Elohim Foundation evolution and relate to how adoption of underlying ESS principles could influence and re-direct programme development.

3. **Elohim Foundation facilities, operations management**. These are the internal structures and support services that govern our business transactions which also should be guided by ESS principles.

2.3. **Applicability:** Projects with yearly budgets amounting to USD 160,000 and above shall undergo environmental and social risk assessments prior to the development of a full activity or project proposal for funding.

3. Definitions

3.1. **Partner**: Stakeholder organizations, including research partners, capacity development and education partners, policy link and facilitative partners, investors, and funding/business/enterprise partners.

3.2. **Principal Investigator**: Individual(s) designated by the grantee and approved by the donor agency, who will be responsible for the scientific or technical direction of the project.

3.3. **Programme**: A group of related projects, sub-programmes, and programme activities managed in a coordinated way to obtain benefits not available from managing them individually.

3.4. **Project**: A set of specific activities to deliver agreed products (within a specified time) between collaborating parties that are supported by funds.

3.5. **Project Life Cycle**. The series of phases that a project passes through from its initiation to its closure.

3.6. **Risk**: A risk is the effect of uncertainty on Elohim Foundation objectives. It is the threat of an event that may have an adverse or advantageous impact on the achievement of the business objectives of an enterprise.

3.7. **Reputational Risk** is any risk that has the potential to damage the public's perception of the organization. Reputational risks would cause the public, beneficiaries, or funders to lose confidence in Elohim Foundation and our work. Examples of factors that could cause reputational risk include: (1) non-compliance with local or national rules and regulations; (2) history of social or environmental misconduct; (3) poor labor conditions for workers.

3.8. **Risk Mitigation** is the identification, evaluation, and prioritization of risks followed by coordinated and economical application of resources to minimize, monitor, and control the probability or impact of unfortunate events or to maximize the realization of opportunities.

3.9. **Safeguards.** Protection measures that aim to avoid, reduce, or compensate for negative effects of activities. Generally, safeguards consist of rules (such as policies, laws, regulations) that reduce the environmental and social risk and negative impact of activities, and institutions that implement those rules.

3.10. **Safeguard Standards.** Levels of attainment of project quality, that can be monitored, measured and reported, and which are designed to help avoid, mitigate, and manage risks and impacts as a way of doing business in a sustainable way.

4. Policy

4.1. The ESS Policy is used by Elohim Foundation, and/or its implementing/executing partners to:

4.1.1. Identify and evaluate environmental and social implications of an intended project;

4.1.2. Ensure that potential adverse impacts and risks are assessed and avoided, or where avoidance is not possible, minimized, mitigated and managed;

4.1.3. Identify and enhance the opportunities project activities provide for positive environmental and social outcomes;

4.1.4. Promote and monitor improved environmental and social performance of implementing/executing partners and Elohim Foundation staff that execute projects;

4.1.5. Promote and provide means for adequate engagement with concerned communities and other stakeholders throughout project preparation and implementation, and ensure that relevant environmental and social information is disclosed and disseminated; and

4.1.6. Ensure that stakeholder responses are managed appropriately.

4.1.7. Ensure that Elohim Foundation operations and procurement processes reflect the underlying principles of the ESS Policy.

4.2. Elohim Foundation ESS Policy includes thematic Safeguard Standards. Thematic Safeguard Standards are applicable to any projects with one or more risks identified through the safeguard screening process. Principles (see Section 1.2) address the aspect of "how" while the Safeguard Standards address "what" for Elohim Foundation to avoid, mitigate or minimize the potential and related risks. From a legal point of view the principles are not a component of the Safeguards Policy but are an approach underpinning the design of the Elohim Foundation Safeguards Standards.

4.3. Elohim Foundation ESS Policy sets out the policy objectives, scope, minimum requirements, and principles for five (5) thematic areas that Elohim Foundation considers important and relevant:

1. Biodiversity conservation, natural habitats, including invasive species,
2. Cultural heritage, including traditional and indigenous knowledge,
3. Community health, safety, and security, including social dimensions such as gender, child protection, and labor/working conditions,
4. Land Acquisition and Resettlement, including impacts from Land Tenure changes resulting from project implementation, and
5. Resource efficiency and pollution prevention.

Safeguard standards for each of the areas are provided in the Elohim Foundation ESS Procedures, Annex 2.

5. Roles and Responsibilities (see also ESS Procedures)

5.1. Details of Roles and responsibilities are provided in the Elohim Foundation ESS Procedures. An overview is provided here.

5.1.1. PI: Initial identification of ESS Risk. Will cooperate with Resource Mobilization Unit (RMU) to complete an ESS risk review note, participate in any risk management decision making and to manage risks during project implementation (with Project Management Unit- PMU).

5.1.2. RMU: Owner of the policy. Will monitor compliance of projects to the policy. Responsible for implementation of risk procedure during grant development stage. If necessary, and in consultation with PMU, RMU will elevate high risk activities for assessment and recommendation by a Risk Review Committee designated by DG/CEO/COO.

5.1.3. PMU: support RMU in management of the policy and monitoring of compliance of projects. Responsible for risk procedure during project start-up and implementation stages.

5.1.4 Responsible for the compliance of Elohim Foundation corporate policies and strategies to the policy.

5.1.5. DCS: Director Corporate Services is responsible for the compliance of Elohim Foundation facilities and operations management to the policy.

5.1.6. DG/CEO/COO: Responsible for overall environmental and social performance of Elohim Foundation If necessary, in the case of high-risk initiatives, DG/CEO/ will constitute a Risk Review Committee for risk assessment and recommendation.

1. ESS procedures will include a step for exclusion from further risk assessment if no risk/impact. As before, different levels of approval should follow different levels of risk. RMU and PMU will still maintain current roles in managing the processes and may elevate if risk is deemed high.

6. Review

6.1. This policy will be reviewed every three years or earlier if required by the Resource Mobilization Unit or the PMU. Reviews will include an assessment of the value and implementation of the policy. For example, future reviews should assess whether the implementation of the ESS Policy is simply

an administrative burden or truly adds value to the scientific research process in addition to meeting donor requirements.

6.2. Any changes made to the Policy will be presented to the DG/CEO/COO for endorsement and thereafter submitted to the Common Board of Trustees for approval.

6.3. The ESS policy focusses initially on Elohim Foundation programmes and projects, however corporate polices, strategies and facilities and operation management can be addressed at a later date in as much as senior management sees the need for a broader, higher level ESS engagement. Hence, future versions of the ESS Policy will address items 2.3.2) and 2.3.3) as described in the Annex 2 to this policy document.

7. Related Documentation

7.1. IFC Performance Standards on Environmental and Social Sustainability.

7.2. Research Ethics Policy (Elohim Foundation)

7.3. ESS Procedures.

8. Annexes

Annex 1: (see ESS Procedures)

Annex 2: Planning for ESS at the Elohim Foundation corporate level

ESS at the Corporate and Facilities/Operations/Procurement levels is part of the Policy and Procedure but is currently a pursuit over time. Guidelines and milestones for implementing the policy decision are presented here.

APPROVED BY:

10/09/2022 **10/09/2022**

Mrs. Ngozi Obilor **Dr. Ibecheole, Julius PMD. NES.**

President Board of Trustees. **Chief Executive Officer/Founder**