

HUMAN RIGHTS POLICY

2023



المجلس الفلسطيني للإسكان
Palestinian Housing Council

The strength of the Palestinian Housing Council (PHC) relies deeply on our steadfast commitment to implement all policies and guidelines throughout the execution of PHC's programs and projects. It is our endeavors that form the foundation of our enduring success, and strive to embody the highest ethical and professional standards. This commitment is essential to accomplishing our humanitarian and societal goals and mission. We emphasize the commitment of all PHC employees, across various administrative levels, to adhere to specific policies and frameworks applicable to their respective domains.

These policies and guidelines, signify our complete involvement in building a sustainable and equitable community. They express our fervor in delivering optimal housing services to the community in which we live and operate. The application of these policies is a fundamental pillar in building the PHC's reputation as a trusted entity, committed to sustainable development and earnest work.

Dr. Samieh Al-Abed



Chairman

Contents

Introduction	3
Objectives	3
Key steps for developing a human rights policy	4
1. Assign senior management responsibility	5
2. Establish a cross-functional team.	5
3. Draw on internal and/or external expertise	5
4. Conduct a basic policy gap analysis/mapping exercise.	6
5. Conduct basic mapping of key potential impacts	6
6. Consult internal and relevant external stakeholders.....	6
7. Communicate the policy internally and externally.....	6
8. Reflect the human rights policy in operational policies and procedures.	7

Introduction

The PHC human rights policy sets out how the PHC respects human rights by having policies and processes in place to identify, prevent, mitigate and account for how it addresses its adverse human rights impacts. PHC human rights policy also elaborates on the PHC’s commitment to supporting human rights, that is, to make a positive contribution to promote or advance human rights, in addition to the minimum requirement to respect human rights. Where, PHC is committed to the “Universal Declaration of Human Rights”.

The policy is approved by the board members of the PHC and sets out the PHC’s expectations of its personnel, business partners, and other parties linked to the PHC’s operations, products, or services. As such, it should be publicly available and communicated internally and externally, and be reflected in operations.

Adopting a human rights policy is a precursor to a PHC’s human rights due diligence toward meeting its responsibility to respect human rights. It sends a clear signal to internal and external stakeholders that the PHC is striving to embed human rights into its operational policies and procedures and to understand the human rights impacts of the business, both positive and negative. It also signals a commitment to take respect for human rights sufficiently seriously to allocate management time and resources to developing and implementing a policy, including by consulting externally.

Objectives

- 1. To provide a basis for embedding the responsibility to respect through all PHC functions:** In order to ensure that the PHC’s responsibility to respect human rights is embedded through all functions, it should express its commitment to do so by developing this human rights policy. Such a policy is the first step in showing that the PHC understands its responsibility to respect human rights. It provides the basis for publicly affirming PHC values and embedding responsibility into PHC operations and the way it does business.
- 2. To respond to stakeholder expectations:** As indicated above, there is an emerging international consensus about what steps organizations should take to demonstrate their commitment to respecting human rights, most notably represented by the “Protect, Respect and Remedy” framework and the Universal Declaration of Human Rights.
- 3. To identify policy gaps and alert the PHC to new areas of risk:** PHC can both cause and contribute to adverse human rights impacts through its activities. Further, it may find that its operations, products, or services are directly linked to adverse impacts through its business relationships. The PHC’s existing policies may not address all of these dimensions. PHC may not realize its potential to impact particular human rights without first identifying what human rights mean to the business. Developing a policy can be the catalyst to see human rights risks and become better equipped to deal with human rights issues that arise. Existing policies may

benefit from a human rights approach. For example, environmental policies can focus solely on technical solutions to perceived technical problems and miss the potential impact on communities and people's rights. A human rights approach can also strengthen the consistency of existing PHC policies by demonstrating their alignment with universal values. Moreover, traditional risk management processes that focus on legal compliance and/or risks to the PHC (rather than risks to stakeholders) may miss key potential human rights impacts. As such, a human rights policy and commensurate implementation mechanisms can play a key role in mitigating/managing risks that may previously have been overlooked.

4. **To build trust with stakeholders and address their concerns:** Adopting a human rights policy implies a commitment by the PHC to a human rights approach, through engaging with stakeholders, having appropriate transparency, and a human rights focus. Such an approach is rarely required by existing policies. Policies that focus only on the impact on the PHC may be inconsistent with a human rights approach, and miss risks. Making people part of the process by engaging with stakeholders can help organizations build trust. A human rights policy shows a commitment to being a responsible corporate citizen and provides interested stakeholders with an accessible means of gauging PHC performance. PHC also find that external stakeholders become more willing to engage constructively with them when they have a human rights policy and human rights approach in place.
5. **To trigger in-house human rights learning, management capacity, and leadership:** The very process of developing a human rights policy can have positive managerial spinoffs. developing the policy help:
 - Raise awareness and understanding of the PHC's human rights impact across departments.
 - Build leadership commitment around human rights so that there was political support inside the PHC for resources to be assigned to policy implementation.
 - Generate in-house managerial capacity, insights for future priorities, and enthusiasm around the topic. A human rights policy also provides managers with a public statement to frame responses to human rights questions.
6. **To demonstrate a good business practice:** It is increasingly becoming good international business practice to have a human rights policy or position statement.

Key steps for developing a human rights policy

The development of a human policy can be a dynamic process. When first developing a human rights policy, managers should not feel under pressure to achieve perfection. Each of the steps in this section is important, but the precise order can vary. initially have senior management buy-in and that the impetus for a policy came from below, with the mapping analysis and stakeholder feedback being instrumental in winning senior management support and having resources assigned for policy implementation.

The Key steps:

1. Assign senior management responsibility.

The decision to draft a policy is often made by the chief executive or by one or more senior executives. Whoever instigates the project, a member of senior management will typically need to be appointed to lead the process, sign off on the final policy and assign resources needed for its implementation.

PHC finds that before beginning the drafting process, identifying and summarizing for senior management the “business case” for developing a policy can be a very useful exercise to gain or cement internal buy-in. This might include identifying the key business value drivers and benefits to the PHC of preparing a policy, examples of actual or potential impacts on rights-holders caused, contributed to, or linked to the PHC, the potential impacts/cost of proceeding without a policy, benchmarking against industry peers and/or an explanation of where a policy fits into the broader road map towards addressing the PHC’s responsibility to stakeholders.

2. Establish a cross-functional team.

PHC put in place a cross-functional team, committee, or task force to help steer the policy through the PHC. Whether driven by a team or not, the PHC needs to capture in-house knowledge from across various business units and functions, consider varying legal jurisdictions, draft the policy and later communicate it internally and oversee training and reporting needs. In many cases, a team or committee will retain responsibility for the policy and any revisions in the medium to long term.

3. Draw on internal and/or external expertise.

Making basic policy decisions within the overlapping frameworks of a PHC’s existing standards and commercial management systems, while bearing in mind varying stakeholder expectations, can be demanding. Where human rights expertise exists internally, there is a strong case to keep the process largely in-house to ensure that any lessons learned to stay within the PHC and help build capacity over time. However, where internal human rights expertise is lacking or the PHC’s business operations are particularly complex, external expertise should usefully be drawn from credible online or written resources or through consultation with recognized experts. Assign senior management responsibility; Conduct a preliminary gap analysis/policy mapping; Put in place a cross-functional team; Identifies and draw on internal and/or external human rights expertise; Conduct basic mapping of key potential impacts; Consult stakeholders on the human rights policy; Communicate the policy internally and externally; Reflect human rights policy in operational policies and procedures.

4. Conduct a basic policy gap analysis/mapping exercise.

To determine which of the internationally recognized human rights are already covered by the PHC's existing policies and identify any relevant ones that are missing. PHC find that longstanding corporate policies and codes of conduct already address human rights but that they do not use human rights language, e.g., policies on diversity, non-discrimination, bullying or harassment, health and safety, minimum-age provision, or working hours. Drafting a human rights policy will not necessarily highlight entirely new issues for the business, but can help express and link together existing positions in a different way, or shine a light on issues that might otherwise get overlooked.

5. Conduct basic mapping of key potential impacts

Even during the first phase of developing a policy, PHC have found it helpful to do some basic mapping of the PHC's key potential human rights impacts (or salient impacts) in order to inform the policy drafting process, and/or so that these salient impacts can be acknowledged in the text of the policy itself. In conducting this mapping, it may be helpful to consider industry guidance, known country risks or impacts and the experiences of other companies. This will need to be taken to another level during the impact assessment phase of human rights due diligence.

6. Consult internal and relevant external stakeholders.

In addition to ensuring that the policy is informed by relevant internal and/or external expertise, the PHC should identify key stakeholders. This is to help ensure that the policy is fit for purpose and addresses expectations and concerns of potentially affected groups and other relevant stakeholders. For example, workers and their representative organizations (trade unions) are important stakeholders for labour-related human rights; and engagement with them is generally referred to as "social dialogue". Relevant stakeholders could also include industry peers that have already adopted a policy, those behind sector-based multi-stakeholder initiatives who have experience of advising companies in a similar position and business associations. PHC should also consider involving socially responsible investors, clients, civil society experts, consumers, campaign groups, academics and community groups. Involving potential critics in the process will give a reality check. PHC share an early draft of the policy with stakeholders to elicit feedback. Some of the stakeholders that provide input into the policy will become useful allies during later due diligence phases.

7. Communicate the policy internally and externally.

No policy can be effective unless it is communicated. The policy should be publicly available. It needs to be disseminated to all employees to raise awareness and establish systems of accountability, and be coupled with relevant training. It should also stipulate expectations of business partners and other relevant external parties and so should be communicated actively

to those with whom the PHC has contractual relationships, others directly linked to its operations (e.g., security providers), investors, and, in the context of significant risks, to potentially affected stakeholders. As the emphasis on transparency and “knowing and showing” respect for human rights increases, PHC can only benefit from proactive communication about their progress on addressing human rights issues.

8. Reflect the human rights policy in operational policies and procedures.

Establishing the policy is the first step in a process of actively addressing human rights issues. PHC should carefully consider how other policies and practices they have in place relate to the expressed commitment to respect human rights. Lack of coherence is a common risk; areas where discrepancies may arise include procurement and lobbying. If the human rights policy is not effectively reflected in other policies and procedures and embedded in management across all functions, neglect can quickly become reality even with all the best intentions in place.