

POL HR_010

Code of Conduct and Safeguarding Policy

1. Purpose

The Code of Conduct and Safeguarding Policy is designed to uphold the ethics and values of Flowminder by delivering a Code of Conduct globally, that all staff should abide by. We are committed to the welfare of all children, youth and adults. We oppose all forms of sexual violence and any abuse of power regardless of age, gender, sexuality, sexual orientation, disability, religion or ethnic origin.

The policy also reflects our commitment to these ethics and values to our donors, partners and other stakeholders that Flowminder always operates at the highest level of professional conduct and integrity to maintain the trust built around Flowminder.

2. Scope

'Staff' refers to all employees, volunteers, consultants, contractors or any other representative associated with the delivery of our programmes working with Flowminder. We also expect our partners to adhere to these working practices.

3. Responsibilities

Flowminder has a zero-tolerance approach to serious misconduct and any form of sexual harassment, sexual exploitation or sexual abuse. It is everyone's responsibility to understand the problem of sexual exploitation and abuse and to prevent and report safeguarding issues. If you are a witness or victim to potential breaches of this policy, please refer to the reporting section below.

There will be no exceptions to this Code of Conduct and Safeguarding Policy and any incidents that are brought to light will be thoroughly investigated and dealt with through our disciplinary process or in the case of third party incidents, reported to our partners, funders or other stakeholders.

Project managers must consider child safeguarding in project planning and implementation to determine potential risks to children that are associated with project activities and operations;

4. Specific Policy

4.1 Protection from sexual exploitation and abuse

Flowminder operates in low- and middle-income countries and as a result, there may be times when Flowminder staff come into contact and work with vulnerable adults and children.

Flowminder follows the IASC Task Force recommendations on Protection from Sexual Exploitation and Abuse in Humanitarian Crises and follows the following core principles:

- Ensure compliance with host country and local child welfare and protection legislation or international standards, whichever gives greater protection, and with U.S. law where applicable;
- Sexual exploitation and abuse by Flowminder staff constitute acts of gross misconduct and are therefore grounds for termination of employment or contract;
- Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief in the age of a child is not a defence;
- Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading, or exploitative behaviour is prohibited. This includes the exchange of assistance that is due to beneficiaries;
- Any sexual relationship between those providing or supporting humanitarian assistance and that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of humanitarian aid work;
- Where a staff member develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in Flowminder or not, he or she must report such concerns via the Reporting Procedures set out below, and;
- Staff must create and maintain an environment that prevents sexualisation and abuse and promotes the implementation of their Code of Conduct. Managers at all levels have a responsibility to support and develop systems that maintain this environment.

4.2 Code of conduct

In addition to the above principles, staff shall observe the following:

1. Flowminder staff must always respect the dignity of all people they interact with.
2. Flowminder staff must always conduct themselves in a manner that represents Flowminder. You must always work with integrity and respect for people so as to not harm or damage the image or reputation of Flowminder or its staff.
3. Flowminder staff should be aware of their conduct, dress, religious beliefs, customs, the language they use in countries they visit and be respectful at all times so as to not cause offence.
4. Staff should abstain from any conduct that either during or outside of working hours could be seen, or is known to be, inappropriate.
5. Flowminder staff should always make themselves aware of the law of the country they are in and obey this law.
6. The purchase, consumption or selling of illegal narcotic drugs is strictly prohibited.
7. Staff should not use their position to obtain advantages, favours, gifts or promises of gifts from any person whilst travelling.
8. Staff should not take any photographs or make films of people in the course of their duties unless the work they are undertaking requires them to do so and only if they obtain the approval of all parties involved.
9. Harassment is defined as aggressive pressure, intimidation or unwanted behaviour which you find offensive. In the UK Harassment is unlawful discrimination under the Equality Act if it is connected to age, disability, gender reassignment, race, religion or belief, sex and sexual orientation. This lawful ethic should be used as a baseline when representing Flowminder anywhere in the world. Unwanted behaviour can be spoken or written abuse, images, physical gestures, facial expressions and jokes. Sexual harassment can be an

unwanted behaviour of a sexual nature. Sexual harassment violates peoples' dignity and can make people feel intimidated, degraded and humiliated. Flowminder does not condone any form of harassment either to or from its staff and will rigorously work to remove this if it occurs.

10. Flowminder staff must work with the utmost discretion when working with personal data. All information should be treated with complete confidentiality and should not be disclosed to any third parties unless contractually required to do so and only then after ensuring the data being released has been verified as being correct with the contract.
11. Flowminder staff must not write or publish any information (including photos, blogs, emails etc) relating to work projects involving partners, funders, stakeholders and any other people met within the course of their work without the authorisation of Flowminder.

4.3 Staff member practices when working with minors (aged under 18)

Whilst we do not work directly with minors, some of our partners do, so we may find ourselves working alongside on rare occasions. These guidelines must be observed on these occasions to protect you from possible allegations that may not involve you.

If you are a staff member:

1. You must have a name badge with an affiliation that will be worn at all times while working with minors.
2. You must ensure that all interactions with minors are in an "open and observable environment" and, as such, avoid any situation where you would be alone with individual youth and not able to be observed by others.
3. If it is not possible to be in an "open and observable environment", you must practise "The Rule of Three". The Rule of Three requires one adult with at least two minors or two adults with only one minor at all times.
4. You must ensure that office/room doors remain open unless there is a window in the door or a side window beside it. Doors may never be locked while a minor is inside the room.
5. If you observe signs of physical injury, child abuse or neglect or sexual misconduct with a minor that may have been caused by a Flowminder employee or partner, you must follow the Reporting Procedures set forth below.
6. You must not change clothes in the presence of any youth nor shall you be present when a minor is changing clothing other than outer garments like coats and jackets.
7. You must never release youth at the end of a programme to anyone other than the authorised parent(s), guardian(s), teacher(s), chaperone(s), or an individual authorised by parents in writing.
8. You must never travel alone in a motor vehicle with a minor unless Flowminder has obtained written authorisation for such travel signed by the minor's parent or legal guardian.

5. Reporting Procedures and Investigation

5.1 How to get help or report an incident

Our code of conduct is available as an internal and external document (via our website). Flowminder will investigate all allegations of sexual exploitation and abuse involving Flowminder staff, volunteers, consultants and partners in a timely and professional manner. We may on

occasion secure external investigative expertise if necessary. Investigations are an internal process which may require contact with external actors i.e. local police/judiciary. Investigations will be carried out and documented so that Flowminder has the full information available to base a decision concerning conduct and the disciplinary consequences.

Flowminder may contact the local authorities following an investigation if:

- A crime has taken place
- Confidentiality can be assured
- The victim is in agreement
- Parties involved in the case will not be subjected to further abuse, disrespect or violence

If reporting an incident internally please initially report either via your senior line manager or to the Human Resources Manager.

If you are not an employee of Flowminder, please report any incidents to:

1. The Country Implementation Manager/ In-Country Project Manager
2. The Flowminder Human Resources Manager who will escalate this to the Managing Director
3. If you wish to remain anonymous please send a letter (marked private & confidential) to:
HR Manager, Stiftelsen Flowminder, Cumberland House, Grosvenor Square, Southampton
SO15 2BG, United Kingdom

For contact details of the Country Implementation Manager or In-Country Project Manager please initially contact hr@flowminder.org

The Flowminder Human Resources Manager can be contacted via hr@flowminder.org or sent a letter to Stiftelsen Flowminder, Cumberland House, Grosvenor Square, Southampton SO15 2BG, United Kingdom. If you wish to receive a response please ensure you attach your name and contact details.

In all cases, the Flowminder Managing Director will be notified.

5.2 Victim assistance and survivor-centred approach

Flowminder will offer a survivor-centred approach for which the survivor's dignity, experiences, considerations, needs and resilience are placed at the centre of the process, from the initial activity design to investigating and responding to potential incidents, with appropriate accountability for perpetrators of abuse. Consistent with the UN Protocol on Allegations of SEA Involving Implementing Partners, the survivor should be informed, participate in the decision-making process, and provide consent on the possible use and disclosure of their information. Those interacting with the survivor and/or handling information regarding the allegation must maintain confidentiality, ensure the safety of the survivor, and apply survivor-centred principles without discrimination. When the survivor is a child, the approach must consider the best interests of the child and engage with the family/caregivers as appropriate.

Flowminder will offer victims immediate professional support as is deemed necessary and in-line with the wishes of the victim and to levels appropriate locally.

If the person reporting to you is at risk of immediate harm, danger or threat as a result of Flowminder staff or programmes, you should work to find an immediate safety solution for the person reporting. Contact Human Resources immediately. As soon as possible, this information must be reported to the Managing Director.

5.3 Consequences

Employees who contravene Flowminder's Code of Conduct and Safeguarding Policy will be subject to disciplinary action that may result in their dismissal. Volunteers will have their relationship terminated and consultants who contravene this policy will have their contract terminated.

Partners must disclose if their employees have contravened this policy and must conduct appropriate investigations to a similar standard as Flowminder. If Flowminder becomes aware of such a contravention and the partner has not made Flowminder aware, this may result in funding or services being withdrawn and the partner relationship terminated.

6. Training and Communication of this Document

1. All staff are made aware of the Code of Conduct and Safeguarding Policy as part of their onboarding when joining Flowminder.
2. This document is available for all staff on BreatheHR, Flowminder's in-house online human resources document store.
3. Flowminder's code of conduct is available as an external document via our website.
4. As part of the travel risk assessment process, staff are asked to confirm that they are familiar with the Code of Conduct and Safeguarding Policy
5. All partners and beneficiaries will be provided with a copy of this Code of Conduct and Safeguarding policy or directed to where it is on our website upon engagement.
6. All in-country partners will be asked to provide training to staff equal to or better than the interaction.org Prevention of Sexual Exploitation and Abuse Basics Training if no other recognised training has already been completed -
<https://www.interaction.org/documents/interaction-prevention-of-sexual-exploitation-and-abuse-basics-training-guide/>