

POLICY NAME: Code of Conduct Policy APPROVED BY: CPAC POLICY OWNER: Co-Directors, HR CATEGORY: Human Resources APPROVED: May 14, 2018 REVISION APPROVED: February 13, 2019 NEXT REVIEW: February 2022

1. INTRODUCTION

World Renew, together with their partners, support or implement humanitarian, development and justice programmes in countries around the world. World Renew staff are personally and collectively responsible for upholding and promoting the highest ethical and professional standards in their work.

The management of World Renew have a responsibility to ensure that all staff are aware of this Code of Conduct Policy, they understand what it means in concrete behavioural terms and how it applies to their programme context. Dissemination of the Code of Conduct is supported by World Renew guidance and policy documents, namely, the World Renew Policy for the Prevention of Sexual Exploitation and Abuse, World Renew Child Safeguarding Policy and Policy Guidance Document and the World Renew Complaints Policy and Guidelines for Complaints Handling and Investigations.

The Code of Conduct Policy applies to all the work performed by World Renew and defines required behaviour of staff.

2. SCOPE AND PURPOSE

The World Renew Code of Conduct promotes greater accountability and outlines the key responsibilities of all World Renew Staff members (this term includes paid employees, short-term contracts, board members and unpaid volunteers) to respect the welfare and rights of the people with whom they work in the development and humanitarian context. It is designed to assist staff members in better understanding the obligations placed upon their conduct and to prevent inappropriate behaviour such as: sexual exploitation and abuse, all forms of harassment, fraud and corruption, security breaches, and unethical business practices.

In keeping with the mission of the Christian Reformed Church in North America (CRCNA), all World Renew staff members are expected to uphold their commitment to professional ethics and Christian values in all their relationships and assigned responsibilities. They must seek to ensure that all persons are treated with dignity, respect, kindness, fairness, and impartiality. World Renew staff members must also operate with honesty, integrity, and diligence. World Renew staff members are expected to act as representatives of World Renew and the CRCNA in their professional and personal conduct both on and off the job. Paid staff members



are to remain in compliance with all human resource policies outlined in the CRCNA Employee Manual. Furthermore, all World Renew staff members are expected to comply with all (including civil) laws that govern the national and state or provincial jurisdiction within which they live and work, both on and off the job.

World Renew staff members have the right to work in a safe and secure work environment, free from any violent conduct. World Renew staff members are also expected to conduct themselves in a manner that is free from harassment, threat, retaliation and/or intimidation of others.

3. STANDARDS OF BEHAVIOUR

Therefore, all World Renew staff members shall at all times:

- i. Treat all people with respect, love, and honour in recognition of the dignity that comes from being created in the image of the Triune God
- ii. Respect and promote fundamental human rights¹ without discrimination
- iii. Treat all communities with whom we work (including crisis-affected populations, internally displaced persons and refugees) fairly with respect, courtesy, and dignity, and according to international and local laws and standards²
- iv. Promote the implementation of the World Renew Code of Conduct by creating and maintaining an environment that prevents sexual exploitation, abuse of power, and other forms of abuse and corruption. Managers at all levels have particular responsibilities to support, remediate and develop systems that maintain this environment.
- v. Report immediately any knowledge, concerns or substantial suspicions of breaches of the Code of Conduct to her/his direct supervisor, team leader/agency director, or to the human resources manager of World Renew, who will take prompt and thorough investigative action.
- vi. Be aware that failure to disclose, or to knowingly withhold information about any reports, concerns or substantial suspicions of breaches of this Code of Conduct constitutes grounds for disciplinary measures up to and including termination of employment and/or services.
- vii. Be familiar with World Renew's commitment to providing a safe environment through which to voice a concern, without fear of reprisal or unfair treatment as articulated in the CRCNA Grievance Resolution Policy³
- viii. Uphold the highest standards of accountability⁴, efficiency, competence, integrity and transparency in the execution of their job
- ix. Cooperate with any investigation into alleged breaches related to this Code of Conduct.

¹ For example, in the <u>Universal Declaration of Human Rights, 1948</u>

² Standards include, for example, the <u>Code of Conduct for The International Red Cross and Red Crescent Movement and NGOs in</u> <u>Disaster Relief</u> and the <u>Sphere Standards 2018 version</u>.

³ Regarding the CRCNA Grievance Resolution Policy, please refer to <u>Section 506 of the CRCNA Canadian Employee Handbook</u>.

⁴ This includes professional conduct in relation to accountable and transparent organisation procedures in relation to finances,

governance, and management as well as adhering to international standards such as those noted in footnote 2 above





4. MISCONDUCT

4.1 Sexual Exploitation and Abuse⁵

Sexual exploitation and abuse are forms of violence. World Renew recognizes that sexual exploitation and abuse (SEA) can occur in any development or humanitarian setting. In humanitarian crises, however, the dependency of affected populations on humanitarian agencies for their basic needs creates an additional ethical responsibility and duty of care on the part of all World Renew staff.

To protect all World Renew stakeholders in all situations, Staff shall, while on duty and off duty, adhere to the following compulsory standards of behavior:

Must:

- i. Understand that sexual exploitation and abuse by Staff involved in development and humanitarian work constitute acts of gross misconduct and are therefore grounds for termination of employment or services⁶
- ii. When working with children, avoid actions or behavior which may constitute poor practice, poor judgment, and/or may place a child at risk of abuse.
- iii. Inform his or her supervisor when engaging in a long-term relationship with a member of the community which is benefitting from a development or advocacy programme and/or with another staff member of World Renew in countries where World Renew and its partners undertake long-term development work, to prevent perception of a conflict of interest. World Renew's management is the sole decision-maker on distinguishing a crisis situation from a long-term development situation.
- iv. Adhere to all World Renew policies and procedures and laws.

Must Never:

- v. Engage in any sexual activity with children (persons under the age of 18) regardless of the age of majority or age of consent locally (Sexual activity with children is prohibited. Mistaken belief in the age of a child is not a defense.)
- vi. Visit bars, restaurants or other premises where minors are exposed sexually.
- vii. Exploit the vulnerability of any target group in the context of development, humanitarian and advocacy work, especially women and children, or allow any person/s to be put into compromising situations. Never abuse a position to withhold development or humanitarian assistance, or give preferential treatment; in order to solicit sexual favours, gifts, payments of any kind, or advantage.
- viii. Engage in sexual relationships with members of crisis--affected populations given their

⁵ See <u>ACT Guidelines on the prevention of SEA</u>. See also tools and resources in support of prevention of SEA.

⁶ In countries where it is a legal obligation to report allegations of child abuse or sexual assault to the national police, or other defined agency, the World Renew Country Consultant and/or Team Leader should take into consideration whether, how and when to inform national authorities. The survivor's view shall be sought, as people who report abuse may be at risk from the police in some countries.



increased vulnerability and since such relationships are based on inherently unequal power dynamics and undermine the credibility and integrity of aid work

- ix. Accept, solicit or engage in the buying of or profiting from sexual services
- x. Exploit the vulnerability of any target group in the context of development and humanitarian work, especially women, children or vulnerable adults, or allow any person/s to be put into compromising situations
- xi. Exchange money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour (This includes exchange for assistance that is due to beneficiaries.)
- xii. Abuse a position by withholding development/humanitarian assistance or giving preferential treatment; in order to solicit sexual favours, gifts, payments of any kind, or advantage.

4.2 Harassment

World Renew staff members shall never commit any act or form of harassment which results in physical, sexual or psychological harm or suffering to individuals -- especially women and children. World Renew does not tolerate any form of violation to this policy including harassment (sexual, gender, age and/or racial harassment), bullying, discrimination, unwelcome comments or behaviours that are offensive, demeaning, humiliating, or derogatory, or any other inappropriate behaviour that fails to respect the dignity of an individual.

Therefore, all World Renew staff members must:

- i. Treat everyone with dignity and respect in the workplace, speak with civility and kindness, listen carefully, and consider the other's wellbeing⁷
- ii. Never commit any act or form of harassment which results in physical, sexual, psychological or emotional harm or suffering to individuals
- iii. Never engage in any behaviour, deliberate or otherwise, that makes the recipient feel persecuted, vulnerable and powerless
- iv. Understand what actions constitute harassment, recognize early signs of sexual, gender and racial harassment (among others) and take swift action to prevent and resolve it, including at minimum reporting all examples and suspicions of such behavior to your supervisor and/or human resources manager
- v. Understand what constitutes bullying, empower staff that are affected by it, develop strategies for reducing and stopping it, and take necessary disciplinary action against those found to have committed an act or form of harassment
- vi. Never commit violent, harassing or discriminatory behaviour of any kind directed toward another person in the workplace or in the communities with whom World Renew works (This behaviour is unacceptable and will not be tolerated.)
- vii. Never engage in any behaviour which you know or ought to know is unwelcome, taking into consideration the culture, morals and norms of the people you are working with

⁷ This includes communities with whom World Renew works.





4.3 Fraud and Corruption

World Renew has a zero-tolerance approach to fraud and corruption as articulated in its 2009 Anti-Fraud and Corruption Policy. World Renew staff members shall never take advantage of their position when working with communities, partners or other World Renew stakeholders. World Renew staff are expected to align with CRCNA Finance Policies and World Renew finance guidelines.

Therefore, World Renew staff members - Must:

- i. Promote a culture of honesty and openness among World Renew staff and management
- ii. Be transparent in all work-related financial transactions, including the reallocation of budget surpluses.
- iii. Ensure that financial and other resources are used solely for the intended purpose.
- iv. Declare any known or potential conflicts of interest to their supervisor (e.g. direct relationship with service provider or suppliers of goods for humanitarian or development programmes, etc.).
- v. Always strive for the highest health, safety and environmental standards in all programme work.
- vi. Ensure, where possible, that goods and services purchased are produced and delivered under conditions that do not involve the abuse or exploitation of any persons and have the least negative impact on the environment.
- vii. create a work environment where communities and staff can safely and confidentially raise and report all concerns about suspected fraud and corruption
- viii. Conduct all business in accordance with internationally accepted practices and procedures and uphold the highest standards of accountability and transparency in relations to finances, management and governance

Must Never:

- ix. Steal, misuse or misappropriate World Renew funds or property, ensuring that financial and other resources are used solely for the intended purposes (This also applies to any other income generated such as any interest received/earned on the funds.)
- x. knowingly support individuals or entities involved in illegal activities
- xi. destroy, falsify, alter or conceal evidence material to an investigation or make false statements to investigators in order to materially influence or impede investigations into corrupt, fraudulent, coercive or collusive allegations



4.4 Unethical Business Practices

World Renew promotes moral and ethical business practices. Therefore all World Renew staff members shall:

- i. Always follow transparent, accountable and honest practices when receiving cash donations from the public earmarked for humanitarian or development purposes
- ii. Never use or accept a bribe in the form of money, goods and/or services to secure a contract for services when dealing with suppliers
- iii. Never take part in activities that generate personal, organizational or collective profit such as buying or selling when such activities may affect or appear to affect World Renew's credibility or integrity
- iv. Never share in the profits or budget leftovers as kick-backs, cuts or discounts for personal or organizational benefits
- v. Declare any known or potential conflicts of interest to their employer (e.g. direct relationship with service providers or suppliers of goods for World Renew programmes)
- vi. Never accept any gifts or other favours that may be viewed as influencing the performance of staff functions or duties (Gifts are defined as, but not limited to: services, travel, entertainment, material goods, among others. In order to respect national and local traditions and conventional hospitality, minor token gifts such as pens, calendars, desk diaries, or similar, can be accepted.)
- vii. Never use illegal labour, child labour and/or forced labour in any work or non-work area
- viii. Always pay compulsory income and/or business taxes and comply with national business law and international standards
- ix. Always strive for the highest health, safety and environmental standards in all programme work
- x. Ensure, where possible, that goods purchased are produced and delivered under conditions that do not involve the abuse or exploitation of any persons and have the least negative impact on the environment
- xi. Never use or distribute products or supplies in any development or humanitarian setting that are known to be unsafe

4.5 Security Breaches

World Renew places the security and safety of all staff members and those with whom we work as a top priority and will strive to do all that it reasonably can to ensure that staff members are secure as they go about their work. Security is an individual as well as an organizational responsibility, therefore all World Renew staff members shall:

- i. Adhere to the World Renew principles of safety and security and the CRCNA Crisis Management policy and procedures
- ii. Never bring weapons onto World Renew property or into the workplace, and never use or have in your possession any weapons or ammunition of any kind while on duty
- iii. Never operate a vehicle under the influence of alcohol, drugs or any illegal substance and



always comply with the laws of the home or transit country and/or country of posting

4.6 Violations of rules or regulations

Staff must not violate any internal rules or regulations, including but not limited to the following.

Staff must:

- i. Use IT technology for the appropriate professional or private use, ensuring not to violate this Code of Conduct.
- ii. Protect and safeguard any personal information collected from communities that could put them at risk by following the World Renew's safeguarding systems.
- iii. Specifically for a child or children (including social media activities):
 - Obtain written permission or verbal informed consent from a parent guardian of a child when taking a picture of a child in a portrait or individually or when extensive reporting is made of a child, and the child's face or name is visually identifiable in the photo/film footage. As part of this the general way in which the photograph or film will be used must be explained and the extent of the accompanying identification information agreed. (NOTE: where informed consent cannot be reasonably obtained, staff must limit the identifying details of the photographed subject.)
 - Obtain written permission or verbal informed consent from parents guardians of children (ideally to be secured in advance of trip) when taking pictures/filming groups of children. As part of this, the general way in which the photograph/film will be used must be explained and the extent of the accompanying identification information agreed. (NOTE: Where photos/films that include children are taken spontaneously or unexpectedly, or where informed consent cannot reasonably be obtained, such as photographs/films footage of people escaping emergencies or of people taken from a distance, children should in these cases not be identifiable through the information accompanying the photo/film footage).

Staff must never:

- iv. Use or carry, about their person or in their luggage, any weapons or ammunition firearms, including at any site of lodging or work site.
- v. Consume, purchase, sell, possess or distribute narcotic drugs.
- vi. Drink alcohol or use any other substances in a way that affects her/his ability to carry out her/his role or affects the reputation of World Renew and partners.

5. COMPLAINTS AND DISCIPLINARY PROCEDURES

Violation of this Code of Conduct will not be tolerated and may lead to internal disciplinary actions, termination of employment or services or even criminal prosecution.



Each World Renew supervisor has a responsibility to handle and respond to any allegations of misconduct they receive from their stakeholders about their employees in line with World Renew's policies, specifically the Complaints Policy, and related disciplinary measures. Management of World Renew will diligently investigate record and deal with misconduct, while maintaining discretion and confidentiality (where possible) and protecting the rights of all individuals involved. Breaches of the Code of Conduct should be reported immediately to the supervisor, team leader or to the World Renew Human Resources Manager. If the team leader is the subject of the report, staff should report directly to the World Renew Human Resources Manager. If the complaint, staff should report directly to either the US or Canadian Co-Director. In the event that one of the Co-Directors is the subject of the complaint, staff should report directly to the relevant Board Chair (US or Canada).

If a World Renew staff member becomes aware of a situation that contravenes the Code of Conduct, s/he is required to report the facts to a supervisor, team leader or human resources manager for appropriate action as soon as possible after s/he becomes aware of the concern. Staff who become aware of any suspected illegal activity or violation of civil laws should report this to the World Renew Agency Director and the human resources manager. World Renew will seek to protect staff who report the alleged illegal activities or civil infractions of other World Renew staff under applicable local, state, provincial, or federal laws.

Any World Renew staff person who is found to have purposely made false accusations about another World Renew staff member will be subject to disciplinary action at the discretion of World Renew.

5.1 Complaints

A complaint can be submitted via email, letter or telephone or in person. Complaints should preferably be submitted by email to complaints@worldrenew.net. For further information on how to complain, consult the World Renew website www.worldrenew.net/complaints and the World Renew Complaints Policy.

If a staff member purposely makes false or misleading allegations on any action by another staff, this is considered misconduct and will be subject to disciplinary action.

5.2 Non Retaliation

Stakeholders must be able to lodge their concerns without fear of reprisals or unfair treatment. Although strict confidentiality cannot be guaranteed, World Renew will do its utmost to ensure that complaints are handled with confidentiality and without risking effects on employment or any form of reprisals and/or harassment as a result of highlighting a genuine problem. It should be noted that it may not be possible to keep all information about a complaint confidential as information may need to be disclosed to properly investigate allegations or in the case that any legal proceedings arise.





5.3 Criminal Records and former complaints

Subject to applicable local, state, provincial or federal law, individuals must notify their prospective employer of any criminal convictions or charges prior to employment and of any criminal charges that arise during her/his employment. Individuals must also notify their prospective employer of any former complaints concerning suspected or substantiated misconduct.

6. AWARENESS AND OVERALL RESPONSIBILITY

World Renew has a responsibility to ensure that employees and volunteers are aware of this Code of Conduct, that they understand what it means in concrete behavioural terms and how it applies to their programme context.

All staff have an individual responsibility to familiarize themselves and their dependents with this Code of Conduct and its purpose.

The Code of Conduct will be a mandatory element during induction and all other relevant trainings and briefings.

This document is automatically incorporated in all contracts of employment.

7. ADHERENCE TO THE CODE OF CONDUCT

The World Renew Code of Conduct is valid until the staff member ceases to represent or work for World Renew. Any breach of this Code of Conduct will not be tolerated and may, in accordance with relevant legislation, lead to internal disciplinary actions, dismissal or even criminal prosecution. Such action may be taken against staff and partners depending on the nature of the problem, the results of the investigation and proposed measures.

This Code of Conduct Policy shall be subject to periodic revision and review. The signatory accepts the consequences of any violation of any of the above provisions under this Code of Conduct Policy. All staff are required to sign the Code of Conduct.

8. KEY TERMS AND DEFINITIONS

Abuse: Where the term "abuse" is used in this policy it should be understood to include sexual, physical and emotional abuse, neglect, and exploitation.

Abuse of power: Abuse of power includes any abusive behaviour by a person in a position of authority and trust against someone in a position of vulnerability and/or dependency.



Bullying: is generally aggression expressed psychologically and emotionally but can include physical aggression. The term is used to describe a repeated pattern of negative intrusive violational behaviour against one or more targets and comprises repeated trivial fault-finding criticism, refusal to value and acknowledge, undermining, discrediting and a host of other behaviors.⁸

POLICY

Code of Conduct

Child or Minor: A person under the age of 18 (a child according to the definition in the Convention for the Rights of the Child).

Complainant: the person making the complaint, including the alleged survivor of the misconduct, or another person who becomes aware of possible misconduct.

Corruption: is the offering, giving, soliciting or acceptance of an inducement or reward which may improperly influence the action of any person.

Discrimination: is defined as the unlawful exclusion of, treatment of, or action against an individual based on social status, race, ethnicity, color, religion, gender, gender identity, sexual orientation, age, marital status, national origin, political affiliation, disability Or any other unlawful characteristic activity protected by law.

Exploitation: using one's position of authority, influence or control over resources, to pressure, force or manipulate someone by threatening or coercing them with negative repercussions such as withholding project assistance, not giving due consideration to a staff member's work support requests, threatening to make false claims about a staff member in public, etc.

Fraud: is an intentional distortion, deceit, trickery, and perversion of truth or breach of confidence, relating to an organization's financial, material, or human resources, assets, services and/or transactions, generally for the purpose of personal gain or benefit. Fraud is a criminal deception or the use of false representations to gain an unjust advantage.

Informed consent: permission given with reasonable knowledge of the risks involved, potential consequences and available alternatives.

Harassment: is defined as any comment or behaviour that is known (or ought to be known) to be unlawful or unwelcome by another person. This includes comments or behaviours which are known or ought to be known to be offensive, demeaning, humiliating, derogatory, or any other inappropriate behaviour that fails to respect the dignity of an individual. Harassment can be committed by or against any member of the community with whom we work, partners, employees, vendors or other individuals visiting or doing business with an agency (see definition of sexual harassment further below).

⁸ Adapted from the National UK Workplace bullying advice line



Gender based violence (GBV): "Any harm that is perpetrated against a person's will; that has a negative impact on the physical or psychological health, development, and identity of the person; and that is the result of gendered power inequities that exploit distinctions between males and females, among males and among females. Although not exclusive to women and girls, GBV principally affects them across all cultures. Violence may be physical, sexual, psychological, economic, or sociocultural."⁹ Gender-based violence may manifest in numerous ways: domestic violence, battering, rape and marital rape, female genital mutilation, torture, trafficking, forced prostitution, dowry-related violence, marriage and in certain cases, violence perpetrated or condoned by the state.

Misconduct: any breach by staff of applicable national or international law as well as contraventions of World Renew internal rules or policies including this Code of Conduct, regulations or other instructions issued by the relevant manager or authority including contextualised security provisions and sexual harassment policies.

Protection: ensuring that individual basic human rights, welfare and physical security are recognized, safeguarded and protected in accordance with international standards.

Sexual abuse: is actual or threatened physical intrusion of a sexual nature, including inappropriate touching, by force or under unequal or coercive conditions. (United Nations Secretary General's Bulletin 2003/13, 9 October 2003; Special Measures for Protection from Sexual Exploitation and Abuse).

Sexual exploitation: is defined as any actual or attempted abuse of a position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another (United Nations Secretary General Bulletin, 9 October 2003). In these situations, the potential victim believes she/he has no other choice than to comply; this is not consent and it is exploitation. Some examples include, but are not limited to:

- Humanitarian/development worker demanding (or accepting) sex in exchange for material assistance, favours, or privileges
- Teacher insisting on (or accepting) sex in exchange for passing grade or admission to class
- Refugee leader demanding (or accepting) sex in exchange for favours or privileges
- Security worker insisting on (or accepting) sex in exchange for safe passage
- Driver demanding (or accepting) sex to give a female person a seat in the vehicle

Sexual harassment: Sexual harassment means any unwelcome sexual advance, comment, expressed or implied sexual demand, touch, joke, gesture, or any other communication or <u>conduct of a sex</u>ual nature, whether verbal, written or visual, by any person to another individual 9 Ward, Jeanne. (2002). If Not Now, When? Addressing Gender--Based Violence in Refugee, Internally Displaced and Post--Conflict Settings. New York: The Reproductive Health in Conflict Consortium.



within the scope of work. Sexual harassment may be directed at members of the same or opposite sex and includes harassment based on sexual orientation or gender identity. Sexual harassment can occur between any one or more individuals, employee or beneficiary, regardless of their work relationship.

Subject of Complaint (SOC): The person alleged to have perpetrated the misconduct in the complaint.

Survivor or victim: The person who is, or has been, sexually exploited or abused. The term survivor implies strength, resilience and the capacity to survive.

Vulnerable Adults: Any person aged 18 or over who, additionally, either:

- a. has particular care, support or special needs and as a result abuse can occur when they are mistreated, neglected or harmed by another person who holds a position of trust or
- b. the adult is dependent/reliant on others for the provision of basic services because of their context (eg in a refugee camp or as a recipient of relief supplies or in an unfamiliar country/ location) and are potentially vulnerable to exploitation or abuse as a result of their status or lack of power/control or
- c. The adult is in a relationship (social or work), or in contact with, another adult who seeks to misuse their position of authority or trust to control, coerce, manipulate or dominate them.

Weapon: an implement, including weapons regulated by the government, that is designed to be used, or intended for use (a) in causing death or injury to any person, or (b) for the purpose of threatening or intimidating any person

Workplace violence: Any incident, in which a person is abused, threatened or assaulted in circumstances relating to their work. These behaviours would originate from customers or coworkers at any level of the organisation. This definition would include all forms of harassment, bullying, intimidation, physical threats/assaults, robbery and other intrusive behaviours (ILO).

World Renew Staff: refers to all World Renew staff, volunteers, consultants, exposure visit participants, contractors, and fieldworkers.