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Do The Right Thing

We can all do the right thing every time we are trusted to make the right decisions by applying common sense and judgement, while acting according to VSO’s values and ambition. If you do not find the guidance you seek in our code of conduct, policies or standards, you should ask a simple question:

Is my action in line with VSO’s purpose and values?

Is it Legal?
Does it feel right?
Would I be comfortable explaining what I did to my manager, colleagues, friends and family?

NO or NOT SURE?

STOP! If the answer to any of these questions is ‘no’ or ‘not sure’ then don’t proceed. Seek advice and guidance. It is always better to ask a question, than to guess an answer. Guidance on who to speak to for help or advice, and how to raise a concern, can be found in this document.

Our Vision

Our Vision and Purpose:
A fair world for everyone
Creating lasting change through volunteering

Our Values:
Collaboration
Empower poor and marginalised people to take charge of their own development
Share skills and knowledge to create long lasting, sustainable change
Build collaborative partnerships that promote innovation, growth and impact

Knowledge
Lead volunteering for development, setting the standard for ourselves and others
Use evidence and insight to guide our actions
Recruit the right people and work where we have the greatest impact

Inclusion
Stand beside and advocate for those who have been denied choice and opportunity
Promote diversity and equality throughout our work
Encourage different, inquisitive perspectives

Integrity
Commit to safeguarding and take a zero-tolerance approach to abuse and harm
Treat others with respect, as equals
Be open, transparent and accountable in everything we do

Our Code:
We care about our primary actors and our organisation and are committed to the highest standards of ethics and behaviour. We are expected to demonstrate personal integrity and live the values and behaviours that underpin all of our work.
Introduction

Employees and volunteers play an important role in ensuring VSO remains true to our values and that our brand is respected and credible. This Code sets out the standards and expectations of employees and volunteers in terms of professional ethics, integrity, acting as a representative and safeguarding, which support our vision, purpose and values. This Code of Conduct overarches all of VSO’s policies and procedures which guide conduct and behaviour, all of which are underpinned by VSO’s People First principles.

This Code of Conduct applies to employees, workers, volunteers, consultants, agency workers and partners who work with or on behalf of VSO

Individual Responsibility: You are expected to demonstrate personal integrity and live the values and behaviours that underpin all of our work. Specifically, each employee is required to comply with our code of conduct. It’s your responsibility to stay informed by learning the standards of conduct that apply to your role and participating in ethics and compliance training sessions. Seek guidance and consult with others when the appropriate course of action is unclear. Stand firm by resisting pressure to compromise our standards or cut ethical corners to meet an objective and raise concerns if something doesn’t seem right.

Line Manager responsibility: Lead by example and be a positive role model to others, promote awareness of the standards and encourage the sharing of concerns. Coach the team, monitor conduct and be responsive to anyone who raises an ethics or compliance concern and ensure there is no retaliation from reporting.

Partners & Agency Workers: We want to do business with partners who share our values. We strongly encourage all our partners to adopt clear commitments on ethical conduct like those in our Code, and any party operating on VSO’s behalf must ensure that their actions comply with our code of conduct and policies. If you are responsible for a relationship with a partner, you should make sure their commitments meet our standards.

Failure to comply with the code of conduct, VSO policies, employment or placement terms and conditions may result in action under VSO’s disciplinary procedure for employees or a volunteer status review.

Relevant VSO Policies:
- **Discrimination** - Global Harassment, Bullying and Intimidation Prevention Policy, Diversity and Inclusion Policy, Global People Resourcing Policy
- **Safety & Security** - Global Safety and Security Policy
- **Safeguarding - Global** Safeguarding and Child Protection Policy

Discrimination

We celebrate diversity, value each other and do not tolerate discrimination or harassment

We uphold the VSO code of conduct when we:
- Establish, maintain and develop relationships based on trust and respect.
- Exhibit and defend professional and personal integrity and honesty at all times.
- Demonstrate sensitivity for the customs, practices, culture and personal beliefs of others.
- Promote and adhere to VSO policies and practices that promote equality of opportunity, diversity and social inclusion and support human rights and dignity.
- Comply with VSO’s data protection policy requirements.
- Observe confidentiality in respect of information disclosed or revealed in the course of employment. This includes making sure you are not overheard in public spaces as well as not actively disclosing confidential information. Remember we have many agreements in place which require us to keep third party information confidential as well as keeping VSO information confidential. Any breach is considered a disciplinary offence and appropriate action will be taken.
- Support and challenge others if you suspect unlawful or unethical conduct or behaviour.
- Dress appropriately at all times both within the workplace and when representing the organisation
- Promptly report any concerns about bribery or corruption.
“We celebrate diversity, value each other and do not tolerate discrimination or harassment”
Safety & Security

We are all responsible for safety & security at VSO

We uphold the VSO code when we:
• Promptly report security or safety concerns.
• Familiarise ourselves with and abide by the Safety and Security policy.
• When travelling for VSO in country or internationally, communicate and share detailed travel planning with relevant stakeholders.
• Adhere to local laws, cultures, and norms in country.
• Demonstrate responsible safety and security behaviour 24/7 and act as an ambassador for VSO.

Safeguarding

We take responsibility to ensure that our people, partners, programmes and projects do no harm.

We uphold the VSO code when we:
• Do no harm to children, young people, vulnerable adults or anyone we come into contact with during the course of our engagement with VSO, through action or omission.
• Do not expose others to the risk of discrimination, neglect, harm or abuse.
• Do not purchase, or coerce, sex acts.
• Work in accordance with health, safety and security guidelines and avoid behaviour that creates unnecessary risk to us or others.

We as VSO employees and Volunteers are expected NOT TO:
• Not to take images or interview children, adult primary actors or community members without their informed written consent - in the case of children the consent of their parents must be given.
• Communicate with a child or adult primary actor via digital platforms (e.g. Facebook, Twitter), via mobile technology (e.g. texting, WhatsApp) without managerial consent.
• Sexually harass anyone. Sexual harassment is unwanted or unsolicited sexual attention that does not involve physical contact, such as sexualised comments, jokes, or gestures. This can be in person or via digital media.
• Sexually assault anyone. Sexual assault is unwanted or uninvited sexual contact. This includes, grabbing, fondling, deliberately touching without consent.
• Rape anyone. Rape is non-consensual penetration including oral, genital, and rectal.
• Sexually abuse anyone. Sexual abuse involves forcing or enticing a vulnerable person to take part in sexual activities where that person is unable to give consent for example a child or a person with disabilities.
• Sexually exploit anyone. Sexual exploitation includes taking advantage of an imbalance of power to manipulate or coerce another person to engage in sexual activity for financial, sexual, or political benefit of the abuser.
• Exchange money for sexual activity, this includes paying for sex with a sex worker,
• Be aware that people can hold or lack power based on characteristics such as gender, race, disability, sexuality, caste, ethnicity, education, their role in an organisation. A lack of power can increase the risk of exploitation and abuse and the misuse of power and privilege is at the core of abuse, sexual exploitation, and sexual violence.
• Immediately report any concerns, suspicions or incidents that indicate the safeguarding policy has been breached by anyone associated with VSO.
We as VSO employees and Volunteers are expected NOT TO (continued):

...which is a form of exploitation and applies even in countries where this is legal.

- Exchange employment, goods, or services for sexual favours or other forms of humiliating, degrading or exploitative behaviour.
- Develop or seek to develop a sexual relationship with a primary actor of any age; such relationships are not acceptable and will not be tolerated since they are based on inherently unequal power dynamics.
- Physically harass, assault, or abuse another person.
- Emotionally abuse another person such as engaging in behaviour intended to shame, humiliate, belittle, or degrade.
- Condone or participate in any behaviour which is abuse, discriminatory, illegal, or unsafe.
- Use any form of technology to exploit or harass another person.
- Use any form of technology to access, view, create, download or distribute indecent images (e.g. pornographic images, sexualised images of children, images of child abuse).

QUESTION: I know certain costs, like alcohol or entertainment costs, are unallowable on grants. Can I code them to “sundry” so it will not stand out on the financial report?

ANSWER: No, you may not misclassify an expense so that it can be paid from a remaining budget line or charge any unallowable cost to any budget line item.

QUESTION: The program I work with has a target of reaching 50 percent women. The team is registering women as clients to make the numbers look good in reports, but in practice we are delivering program services to their husbands, not directly to the purported female clients. What can I do?

ANSWER: You should raise this concern as described in the “Getting Help” section of this Code.
Our Personal Ethics & Integrity

Our Commitment to Our Organisation

Relevant VSO Policies:

- Conflict of Interest - Global Preventing Criminal Practices policy
- Gifts and entertainment - Global Preventing Criminal Practices policy
- Relationship conflicts - Global Preventing Criminal Practices policy
- Bribery & corruption Government and political bodies - Global Preventing Criminal Practices policy

Conflict of Interest

We all have a duty to act in VSO’s best interests at all times

In the course of their work, it is essential that employees and volunteers avoid any suggestion of bias or favouritism in any of their dealings with partners, primary actors, service providers, suppliers, or other employees, volunteers and stakeholders. Any potential conflicts (direct or indirect) must be declared in line with the Criminal Practices Policy. Conflicts could include, but are not limited to:

- Interests of immediate relatives and extended relatives, friends and acquaintances.
- Any work paid or unpaid, outside VSO.
- Being a member of an elected body.
- Shareholdings (if this could have an influence on the decision making of a company).
- Relationships with service providers and suppliers, other employees or candidates for employment with VSO.

Offers of Gifts, inducements and hospitality

We should never give or accept inappropriate gifts or entertainment

- Any money, gift or favour received by an employee or volunteer from a person or organisation holding or seeking to obtain a contract from VSO will be deemed by VSO to have been received corruptly unless the employee or volunteer proves the contrary.
- VSO expects all staff and volunteers to abide by the Global Criminal Practices policy, and where necessary to abide by local legislation to ensure transparency and ethical practice.

- Any breach of this policy will be treated as a serious disciplinary matter and/or a criminal offence.

Relationship conflicts

We report any relationship conflicts that exist and seek clarification when unsure

- Where a personal relationship exists, has existed or develops between employees or volunteers where one party has a management or supervisory responsibility over the other, the existence or former existence of the relationship should be disclosed to the relevant senior manager.
- Managers who have, or have had, a personal relationship with an employee or volunteer should not be involved in any recruitment, selection, performance review, promotion or other processes which could be perceived to give unfair advantage or disadvantage to the other person with whom they have or have had such a relationship. It is the responsibility of employees and volunteers involved in recruitment and selection to declare any relationship.

Bribery and corruption: Government and political bodies

We do not tolerate bribery or corruption in any form

- We never offer, authorise, or accept bribes, including ‘facilitating payments’ (i.e., small payments made to speed up what should be routine government action), or any other form of improper payments with the intention of obtaining a benefit
- We always follow the VSO policy on gifts and entertainment
- We always ensure that all accounts and financial records are complete and accurate, that it is clear what each transaction relates to, and that there are no undisclosed, unrecorded or vaguely described transactions
- We always refer to the VSO internal lawyer on any requests for cash payments of any value to a government official

“We all have a duty to act in VSO’s best interests at all times”
Our Assets & Information
Our Commitment to Our Organisation & Partners

Relevant VSO Policies:

• Data privacy - Data protection policy, Global Risk Management policy

Data protection/privacy and information security

We all have a responsibility to protect and manage VSO’s data and information and will observe the following:

• We comply with VSO’s data protection policy requirements.
• Maintain confidentiality in respect of information disclosed or revealed to you in the course of your employment with VSO. This includes making sure that you are not overheard in public spaces and are not actively disclosing VSO confidential information.
• We do everything it takes to ensure confidentiality of VSO’s data. E.g., Using strong passwords, classifying information correctly, limiting access to those who only need it to do their jobs, disposing off information appropriately and taking care of the organization’s information when in public.
• We Safeguard the confidential and proprietary information of institutional donors and the personal privacy data of individual ones.
• Comply with agreements that require VSO to keep third party information confidential
• We respect confidentiality, abide by data-protection protocols, and share personal information about clients on a need-to-know basis in line with donor rules.

Our Leadership & Partnerships
Our Commitment to Our Partners & Society

Relevant VSO Policies

• External communication and social media - Social Media policy, Ethical fundraising policy
• Relationships with customers, suppliers and other partners - Global procurement policy

External communication and social media

We always act and communicate responsibly as representatives of VSO.

• We always act in a way which supports and upholds the reputation of VSO and behave as role models to others. We are mindful of our responsibilities as professional people towards the wider community.
• We comply with prevailing laws and do not encourage, assist or collude with others who may be engaged in unlawful conduct.
• When involved in local political, religious, or community leadership activities, we ensure that VSO’s mission and objectives in the country are not compromised.
• We display a neutral, non-partisan attitude and approach towards political matters during our work for VSO.
• We always direct all enquiries to the relevant communications team who are mandated to speak to the media/public on behalf of VSO.
• Outside of work, if we decide to comment on social media (i.e., blogging, tweeting, posting on social media) about the VSO, we make it clear that the opinion we are expressing is our own and not VSO’s.
• We take extra care to exercise good judgement before we make comments on social media that might affect the reputation of the organization.

“Our breach is considered a disciplinary offence and appropriate action will be taken”
Relationships with customers, suppliers and other partners
We expect our partners to apply the same core principles in their operations as are in this code of conduct

- If involved in procurement activities in the organization we must act ethically, impartially and objectively in all our purchasing activities.

- We must adhere to procedures on segregation of duties, documentation and transparency, conflicts of interest, gifts and bribes, as well as confidentiality.

- We must all abide by VSO’s code of conduct and relevant VSO HR policies when carrying out procurement.

- We must actively encourage our suppliers to apply the same core principles of our code in their own operations.

- If the concern is about the Chief Executive, contact the Chair of the Board of Trustees
- Confidential dedicated reporting email whistleblowing@vsoint.org
- Report safeguarding concerns – confidential e-mail safeguarding@vsoint.org

All suspected breaches of the Code will be investigated in line with the appropriate policy. Where it is found that there has been a breach of the Code of Conduct there will be a disciplinary or status review process.

Anti-Retaliation
VSO will not tolerate retaliation against anyone who, in good faith, reports a concern or participates in an investigation, even if the allegation ultimately is not substantiated. Anyone found to have engaged in retaliatory conduct against someone will be subject to disciplinary action, and possibly termination.

Our Policies:
To know more about our code of conduct, rules and regulations click here.

Help, Advice & Raising Concerns
Our Duty to Report

Related policy:
- Global whistleblowing policy

Channels for Raising Concerns:
Every situation is different, and no code can cover everything. If you are ever in any doubt about how to do the right thing, you should seek help or advice. Report immediately any breaches of this Code through the established reporting mechanisms below:

- Your manager
- A more senior manager
- A HR representative
- People Business Partner acting as your designated safeguarding officer
- The Head of Internal Audit and Risk Management.
- Internal Lawyer
- If the concern is about a member of the Executive Board, contact the Chief Executive

Concerns can be raised confidentially at whistleblowing@vsoint.org safeguarding@vsoint.org
Global Code of Conduct Agreement

Acceptance Form

- I Confirm that I have received, read and understood the VSO Global Code of Conduct which include guidelines on:
  - Safeguarding
  - Discrimination:
  - Safety & Security
  - Conflict of Interest
  - Offers of Gifts, inducements, and hospitality
  - Relationship conflicts
  - Bribery & corruption Government and political bodies
  - Data protection/privacy and Information security
  - External communication and social media
  - Relationships with customers, suppliers, and other partners
  - Channels For raising Concerns and
  - Anti-Retaliation statement

- I confirm that I understand that they form part of the terms and conditions of my employment/volunteering contract

- I confirm that I shall undertake to act in accordance with the code at all times

- I confirm that I understand that I should contact my manager, the compliance team, legal or the whistleblowing email if I require guidance or additional assistance in applying the code to a particular situation.

- I confirm that I understand that I may be required each year to sign the Code of conduct acceptance form to confirm that I have read and understood and applied it when carrying out my responsibilities at VSO.

- I understand that failure to comply with the above will result in disciplinary action under VSO’s disciplinary procedure for employees or a volunteer status review

I have read, understood and agree to abide by VSO’s Global Code of Conduct.

Name: __________________________________________________________________________

Role: __________________________________________________________________________

Project/Department: __________________________________________________________________________

Signature: __________________________________________________________________________

Date: __________________________________________________________________________

Please return your completed form to your manager or your People Lead.