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Code of Conduct

I. Introduction

This Code of Conduct sets out the basic standard of conduct expected of all staff and volunteers working for Peace Child International. It also sets out our policy on matters like acceptance of bribes and the immediate declaration of conflict of interest by staff in connection with their official duties. This Code also applies to temporary or part-time staff, external mentors, local and international volunteers hired by the organization or by one of our partners.

II. Prevention of Bribery

An employee of the organization who solicits or accepts a bribe in connection with his work is committing an offence. The term “bribe” – or sometimes euphemistically called “Advantages” - includes anything of monetary value such as money, gifts, commissions or fees, jobs, contracts, services or sexual favours.

III. Acceptance of Bribes

PCI’s policy is to prohibit all staff from soliciting any bribe from any persons doing business with it (e.g. trainees, staff, suppliers, contractors etc.). A staff member who accepts a bribe in return for awarding places or contracts will suffer immediate dismissal upon agreement of a review panel composed of their peers. Any gifts offered voluntarily to the staff in their official capacity are regarded as gifts to the organization and they should be declared to management. Staff should decline such offers where possible as their acceptance influences the objectivity of the organization’s operations and can lead to complaints of bias or impropriety.

For gifts which are presented to staff in their official capacity and of nominal value the refusal of which could be seen as unsociable or impolite (e.g. a plaque presented to a staff member during a seminar to which s/he is invited to be the guest speaker), staff have a blanket permission to accept such tokens of appreciation and acknowledgement. Any gift given to a staff member in their private capacity, from a person who does not have any official dealings with PCI or a PCI project is, of course, perfectly acceptable. In case of doubt, the staff should refer the matter to the local partner management or in country PCI staff for advice and instruction.

IV. Conflict of interest

A conflict of interest situation arises when the “private interests” of the staff competes or conflicts with the interests of the organization. “Private interests” mean both the financial and personal interests of the staff or those of their connections including:

- family and other relations; e.g. personal friends or romantic relationships
- clubs, businesses and/or societies to which they belong or are shareholders; - and -
- any person to whom a staff member has financial involvement, is in debt, owes a favour or are obligated to in any way.

Staff should avoid using their official position or any information made available to them in the course of their duties to benefit themselves, their relations or any other persons with whom they have personal or social ties. They should avoid putting themselves in a position that may lead to an actual or perceived conflict of interest with the organization. Failure to avoid or declare any conflict of interest may give rise to criticism of favouritism, abuse of authority or even allegations of corruption which, if proven to the satisfaction of a peer review panel, may result in the dismissal of the staff member concerned. In particular, staff involved in procurement or recruitment should declare conflict of interest if they are closely related to or have beneficial interest in any company or persons which is being considered for selection as the supplier of goods or services or for a job within the project.
When called upon to deal with matters of the organization for which there is an actual or perceived conflict of interest, a staff member should make a declaration in writing to the local partner management, or in the case of the partner manager to PCI staff. S/he should abstain from dealing with the matter and follow the instruction of management who should reassign the task to other staff.

V. Entertainment

“Entertainment” refers to food or drink provided for immediate consumption. Although this is not a “bribe”, it becomes suspicious when staff and/or volunteers accept lavish or frequent entertainment from persons with whom the organization has official dealings (e.g. suppliers or contractors). The local partner /PCI management should prevent this so as not to place the organisation, project or the staff member in a position of obligation to the provider.

VI. Misuse of Official position

Staff members who misuse their official position for personal gains or to favour their relatives or friends are liable to disciplinary action or even dismissal. Examples of misuse include a staff member responsible for the selection of suppliers giving undue favour or leaking tender information to a relative’s company with a view to awarding the contract to the relative.

VII. Data Protection & Handling of Intellectual Property, Classified or Proprietary Information

The PCI and our projects operate under the standards of data protection and intellectual property / copyright & patent laws operating in the UK. Under UK data protection laws, which are common to all OECD member states, staff & volunteers are not allowed to disclose any personal details of trainees, loanees or their business data to persons unknown without the express, written authorization of the owner of that information, supported by the written consent of the local partner manager. Examples of misuse include disclosure of information in return for monetary rewards, or publication of such data online, in social networks or via e-mail circulars or reports. Any such misuse or unauthorized disclosure of personal data will be deemed a breach of this Code of Conduct and therefore grounds for dismissal.

Business “IDEAS” are in the public domain; some trainees’ Business Plans maybe accepted for mounting on the Peace Child International Website in the password-protected members area to give ideas and details of budgets etc. to other PCI Network Members. However, the Intellectual Property contained in the details of a product or a service developed by a project trainee remains the sole property of that trainee and should not be shared or released by any staff member or volunteer. An example of the distinction between and “Idea” and “detailed content” would be the “Idea” of a juice-blending and sales business. That is public information. The detailed content would be the juice-sellers recipes for his/her own brands of juice. In the same way, the idea of youth-led business training as practiced by PCI, our partners and our network is public knowledge and something that we want to promote and celebrate throughout the world as loudly as possible. But the detailed content of our Lesson Plans, Training Tools and Business Plan Templates are the Intellectual Property of Peace Child International and not to be shared with anyone outside our network, without prior permission by PCI management.

VIII. Property of the Organization

Any property of the organization – laptops, furnishings, motor vehicles or any thing bought specifically for use by a project – should be used by staff for that purpose alone. It should be treated with great care, and any damage should be reported to the local partner manager to schedule reparation. Personal use of equipment is prohibited unless the local partner manager has specifically given permission. Misappropriation of the organization’s property for resale
is strictly prohibited and will result in immediate dismal and reimbursement of the full value of the motorbike to the project.

IX. Outside employment

Volunteers who wish to take up paid outside work, including part-time work, (eg, Language lessons, private tuition etc.) must seek the written approval of their direct superior before accepting the job. Approval will not be given if the outside work is in conflict with the interest of the organization or there is major conflicts of time management with the work of PCI.

X. Personal conduct

PCI is dedicated to providing a safe and non-discriminatory working environment for all staff members. Such a commitment requires that all staff members understand and abide by this code of conduct dealing with health, safety and appropriate treatment of co-workers.

1. Safety: Every project and environment has to fill out a detailed Risk Assessment covering all hazards that could possibly be encountered by staff in the conduct of their duties and in their social lives. Avoiding and mitigating these hazards has to be the priority concern of all staff, particularly local partner manager and in-country PCI Staff. Deliberate contravention of Hazard Mitigation that puts project participants and/or staff members at risk, is a serious breach of this Code and may be punished with dismissal.

The Risk Assessment is not a Final Document: as new risks and hazards emerge, staff and management are urged to update the risk assessment and if needed work out appropriate mitigation procedures. Any revision to the Risk Assessment form should be forward to the PCI HQ.

2. Alcohol, Controlled Substances, etc.: All staff members should make sure they are fit and able to perform their assigned duties when they report for work. Any staff member reporting for work when under the influence of alcohol or drugs are liable to face disciplinary action. The use, sale, possession, manufacture, dispensing or distribution of alcohol, unauthorized drugs or controlled substances by a staff member on organization’s premises is prohibited. The abuse of legal drugs on organization’s premises or during normal work hours is likewise prohibited. Staff members who are taking legally prescribed drugs and who are concerned that such drugs may impair their ability to perform their normal work assignments must consult with their physician immediately. The organization retains the right to search any and all organization’s property, at any time. Controlled, prohibited or illegal substances will be confiscated, and where appropriate, turned over to the authorities.

3. Illegal Weapons or Substances: The possession of firearms, sharp knives, prohibited weapons and/or drugs or any kind is forbidden by this Code of Conduct. All volunteers will live in safe parts of the city, and possession of weapons will not be necessary, and may create problems where none exist. Any volunteer found in possession of a weapon or prohibited substance is liable to instant dismissal.

4. Drinking: This Code of Conduct recommends sensitivity and respect to local culture. In some cultures drinking alcohol is prohibited and drinking alcohol is seen negatively. In these cultures staff members must take care not to offend local sensibilities. This Code of Conduct discourages staff members and volunteers from excessive drinking when in country, on a field trip or in a community in which consumption of alcohol is prohibited.

5. Fair and Courteous Behavior: All employees should treat their co-workers fairly and courteously without regard to race, color, creed, religion, gender, national origin, tribe, age, sexual orientation, or disability.
6. **Sexual Harassment:** No form of sexual harassment is tolerated: unwelcome sexual overtures, explicit sexual language, comments about sexual preferences or physical appearance – all constitute Sexual Harassment within PCI's definition of the term. Gossip and spreading rumours is also deemed to be Sexual Harassment – possibly the most toxic form of it because it goes on behind closed doors – often in local or tribal languages, which conceal its content and its true intent. Local partner managers will maintain a close watch on employees to make sure that every one is in a comfortable, non-threatening, professional relationship with other staff members. Any such incidences must be reported to local partner management or to PCI staff, and the appropriate action will be taken. Likewise, if any staff member is known to falsely exploit any project participants, such as promising favours of future support, will be immediately dismissed. All staff members have a responsibility in ensuring that no one associated with PCI, a PCI project or activity is sexually harassing project participants.

7. **Violation of Laws:** Staff members are not authorized to achieve any organization objective by violating any Federal, state, city, town, or other governmental or regulatory body’s laws, statutes, regulations or generally accepted rules and standards.

8. **Financial gain:** Staff members can accept no financial remuneration or personal gain from any of the businesses set up by project participants, either during the programme period or after it has finished. Any business set up or loan distributed must operate independently and have no personal attachment to PCI’s in country partner or any staff/volunteers working for them.

9. **Integrity and Professionalism:** Staff members should remember that they mirror the values of the organization. Everything that they do is constantly being judged as a reflection of the values of PCI and our local partners. All staff members should conduct themselves with the highest degree of integrity and professionalism in the workplace or any other location while on organization business. Examples for this include:

   - Professional appearance
   - Punctuality: always showing up on time
   - Collaboration: always working as a team
   - Maintain professional relationships with project participants and stakeholders

XI. **Compliance with the code and whistleblowing:**

It is the personal responsibility of every staff member to understand and comply with this Code of Conduct. All managers should also in their daily supervision ensure that their subordinates understand and comply with the standards and requirements stated in this Code. Any problems encountered as well as any suggestions should be channelled first to the local partner manager and thence to PCI HQ staff for advice and resolution.

Any staff member who violates any provision of this Code should be reported by his or her co-workers. Reports should be made to Local Partner Management or in the case when this is not possible directly to PCI staff. The appropriate action will then be taken to investigate the claim and any disciplinary action, if necessary, will be issued. It is the obligation of all employees to report any misconduct.

In cases where the team members suspect a criminal offence may have been committed, they are authorized to call the police or take appropriate action to protect the safety of other staff members, project participants or members of the public. Equally, if the safety of staff members is threatened by civil unrest or the errant behaviour of another staff member, they must take steps to protect themselves, colleagues and project participants as a matter of the highest priority.
Anti-Bribery Policy

Introduction

1) Financial records must be kept so that:

The UK Bribery Act applies to all of the activities of international organizations and of international federations of related organizations globally, provided that they engage in any commercial activity within the UK.

There are 4 criminal offences. The first two relate to offering and receiving a bribe. The third relates to the bribing of a foreign public official. Bribes can be paid to public or non-public bodies and employees. The fourth relates to the failure of “commercial organizations” to prevent bribery. Therefore all organizations are encouraged to put in place effective anti-bribery procedures.

Our Commitment to Transparency and Accountability

- Peace Child International has a zero-tolerance policy towards bribery.
- We adhere to best practice guidelines as outlined by the Charity Commission.
- We publish our annual accounts, reports and independent evaluations of our work for shared learning.
What Constitutes Bribery and Corruption?

Bribery

Peace Child has a zero tolerance approach to the payment or receiving of bribes directly or indirectly.

This could involve a potential candidate paying money, offering sexual favours in return for a loan.

Or it could involve paying a government official in return for xxxxx.

What staff should do if they are offered a bribe?

Staff members should report this to the management of the contracted local partner and / or to in country PCI staff. PCI HQ should also be informed.

The local partner management in association with PCI staff, in country and HQ, should decide on disciplinary action. Any staff member who has taken bribes, offered to deliver services in return for money, or a loan may be dismissed.

It is the duty of any staff member who finds out that one of their colleagues is taking bribes to report this to the management of local partner and / or to in country or HQ PCI staff.

Payments under Duress

There may be rare and exceptional circumstances when individuals have no option other than to make payments to protect against loss of life, limb or liberty.

If payments are necessary due to humanitarian emergencies, medical emergencies this decision should be made in consultation with the local partner management rather than the staff member.

Gifts and Hospitality

There should be an understanding of when staff can and can't receive a gift (eg. Low value gifts may be accepted, if to refuse would cause offence)

Staff should report to local partner management/PCI in country staff what gifts they have receive.

Staff person should inform local partner management/PCI if they are accepting hospitality for anything more than an informal gathering.

If a grant comes in or money is donated, the local partner management and staff has an obligation not to ‘treat’ themselves, their friends and family using donated or grant money.

Partners

PCI should communicate their zero-tolerance policy to all partners.

Before entering into partnerships PCI and country offices should ensure that they have conducted adequate due diligence. This should involve seeking information about partners’ controls, including anti-bribery policies and procedures. Particularly important is the make up of the managerial structure, whether a board of trustees or board of executives, and their relationship to the day-to-day management of the organization.
Partnership agreements should incorporate appropriate anti-bribery clauses. Best practice is that this document comprises part of the contract, which the partner agrees to adhere too.

**Suppliers, contractors and other third parties**

PCI should communicate their zero-tolerance policy to suppliers, contractors and other third parties.

Before entering into contracting arrangements, PCI should assess the risk involved and conduct appropriate due diligence.

Written contracts should incorporate appropriate anti-bribery clauses.

**Procurement**

Corruption risk in procurement processes

Communicating anti-bribery policies to agents, intermediaries, contractors and suppliers.

**Conflicts of Interest**

A conflict of interest is where a team member may benefit personally from a contract that the project, PCI or local partner maybe considering. In this case, this person should abstain when a meeting is taking place, so that a decision is voted for democratically.

**Register of Interest**

There should be a record of all staff/trustee interests so that any conflicts of interest can be foreseen in advance.

**Political Donations**

Neither PCI nor local partners should make contributions to political organization or individuals, as a means of obtaining an advantage. (In the UK charities are not allowed to make donations to political partners or they lose their charity status.)

**Whistleblowing**

If a staff member is aware that any other staff member is engaged in any bribery, demanding sexual favours, demanding money from loanees etc they should report them to the management of local partner and / or to in country or HQ PCI staff. Their disclosure will be treated confidentially and a discreet investigation will be carried out to substantiate the allegations. The whistleblower should be supported against any possible retaliation.

In the event of reporting bribing or non-adherence of this document by a superior, the report must be made directly to the PCI CEO or the President, who will treat the matter confidently and do everything possible to ensure that the whistleblower is protected from any negative recuperations.

**Conclusion**

PCI CEO holds overall responsibility to ensure these controls are respected. Individual project and programme managers are responsible for ensuring that these controls are enforced within their work and analyzing what steps they are taking to have them implemented. This can be in the form of a risk assessment policy.

The policy should be included in the staff induction and training process and be available in a staff booklet.
About Peace Child

Peace Child International was founded in 1982. We harness the energy, creativity and skills of young people throughout the world to solve some of our most pressing problems – initially peace-building during the Cold War; then environmental degradation and the struggle for sustainable development, and now youth unemployment – both in developing and developed countries.

For more than 30 years, our programmes have been shaped, driven and run by young people, and that’s what makes them so effective.

We are currently working to close the skills gap by improving youth employability, and we’re helping young people create jobs through promoting entrepreneurship and supporting new business ventures.

We do this by providing education, training, mentorship and access to investment capital.

As an organisation in consultative status with the United Nations, we build strong partnerships through our biennial World Youth Congress to advise and advocate youth policy solutions to UN member states, as they make new global agreements on everything from climate change to conflict transformation and the Sustainable Development Goals.

Peace Child International is a UK registered charity (No. 1095189)