

Corporate policy on positive business, ethics and conduct

Revision: v11, *Approved by CGA Board September 2018*

Charlie [redacted]
Goldsmith [redacted]
Associates [redacted]

Contents

1	Introduction: Why we have a corporate policy on positive business, ethics and conduct	3
2	Structure and application	5
2.2	Structure	5
2.2.1	Who this policy applies to, and when	6
2.2.2	Policy Awareness	6
2.2.3	Review and updating	7
2.3	Detailed Policies	7
2.3.1	Conflict of Interest	7
2.3.2	Anti-fraud and anti-corruption	8
2.3.3	Value for Money	8
2.3.4	Recruitment and Equalities	8
2.3.5	Responsible Working Practices	9
2.3.6	Modern Slavery Act 2015	12
2.3.7	Protecting children and vulnerable people	12
2.3.8	(Local) Environment	14
2.4	Crosscutting: Zero tolerance and reporting	14
2.4.1	Zero tolerance	14
3	Reporting	15
3.1.1	Fraud and Corruption	15
3.1.2	Children and vulnerable adults' protection	16
3.1.3	Responsible working	16
3.2	Internal CGA Procedure	16
3.3	External Reporting	17
3.4	Briefing out, oversight, and maintaining compliance	18

1 Introduction: Why we have a corporate policy on positive business, ethics and conduct

CGA's objective, or intended impact, is the alleviation of poverty and promotion of human development, both broadly defined, and focusing on the greatest needs.

To that end, we are committed that our work should help not harm, deliver for the poor, and for those (donors and others) who wish to support them, that it should provide both groups the best possible value for money, and that we should discharge our fiduciary duty to both groups.

We are committed to run an ethical business, with integrity and transparency. It is logical that we do so since we work to help governments and others organise themselves this way. This commitment ensures that we serve best the interests of our own business, staff, clients, as well as the society and government where we serve.

To that end, CGA is committed to an exemplary standard of Positive Business, Ethics and Conduct, set out in this Corporate Policy, which is reviewed annually by the CGA Board. All CGA staff and consultants commit to this when they sign a contract, and, from April 2018 onwards, will be asked to record their recommitment annually.

We are required to abide by the latest edition of DFID's Supply Partner Code of Conduct, and DFID's Statement of Priorities and Expectations (SOPE)ⁱ for all DFID work, and we have chosen to make this the baseline for all our work, irrespective of client, and including pro bono. Standing links to the latest edition of these policies are here, and are an integral part of this policy:

<https://www.gov.uk/government/publications/dfid-statement-of-priorities-and-expectations-for-suppliers>

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/649112/DFID-Supply-Partner-Code-Conduct.pdf

This Statement "sets out a single set of expectations that DFID has of external organisations with which it works, alongside standard elements of good practice", against five key areas. The Statement sets out the ways in which partners are expected to:

1. Act responsibly and with integrity

ⁱ With the release of the Supply Partner Code of Conduct, DFID has not communicated that it has replaced the SOPE; the Code of Conduct will be referenced as the document that supersedes

2. Demonstrate commitment to poverty reduction and DFID priorities, including work in fragile and conflict affected states, recognition of human rights, focus on girls and women, youth engagement, climate change and wealth creation
3. Be transparent and accountable
4. Demonstrate commitment to wider HMG priorities; and
5. Seek to improve value for money.

The last is important to note: it is not sufficient to be compliant, we are committed to maximising value for money and development outcomes.

CGA staff, associates and sub-contractors will be expected to comply with the most recent version of the Statement at any time, and this ethics policy will be revised in line with any substantive changes to the Statement.

Colleagues are urged to refer to the further training materials available on the G-drive.

Positive business, a summary

This policy is deliberately entitled Positive Business, Ethics and Conduct, because it is intended to set out how we wish to behave, rather than merely a list of prohibitions.

Focus on the poor

CGA's objective, or intended impact, is the alleviation of poverty and promotion of human development, both broadly defined, and focusing on the greatest needs.

To that end, we are committed that our work should help not harm and should deliver for the poor. We only take assignments that we believe will contribute to poverty reduction. And what we do, how we do it, and how our team behave and are perceived when they are in a given location are all of concern.

Client service

- We strive to improve value for money for the poor, and for our clients
- We serve our clients properly, and keep reasonable confidences when requested to do so (except when it is a legal requirement to disclose)
- We would not take a government as a client that HM Government does not regard as friendly
- We disclose, and manage, any perceived or actual conflict of interest as soon as it arises

Clean business

- We don't pay bribes to win business

- We don't do unusual hospitality or expenses to win business
- We don't pay facilitation fees
- We do occasionally offer proportionate hospitality – e.g. take our share of buying dinner, pay travel and subsistence expenses to government staff when it is necessary and permissible to do so as part of delivering a programme
- We understand the cases in which the Common Law justification of acts to “preserve life and liberty” applies
- We have zero tolerance for behaviour that is fraudulent, corrupt, unethical or otherwise contravenes this policy
- We immediately report any incidents of potential or actual fraud or corruption, and any near-misses, internally, and to the client and/or donor
- We follow up fully on all incidents of fraud or corruption

Integrity and transparency

- We keep honest accounting
- We pay legitimate taxes in the UK and the countries we work in, as applicable
- We are open and transparent
- We have a ‘no blame’ culture where reports are promptly, fully, and honestly made, for both incidents and near-misses

How we treat people

- We work on the basis of performance, and potential, not on the basis of irrelevant matters. This means that, consistent with UK law, we do not discriminate against anyone because of age, disability, gender, marriage/civil partnership, pregnancy and maternity, race, religion and belief, sex, sexual orientation
- We support good labour practice, and responsible supply chain management (including to prevent human trafficking and slavery)
- Every person matters: we take specific care for protection of children and vulnerable adults

2 Structure and application

2.2 Structure

The Positive Business, Ethics and Conduct policy covers the following areas in turn:

- Conflict of Interest
- Anti-fraud and anti-corruption
- Value for Money
- Recruitment and Equalities
- Responsible working practices, including prevention of

- bullying, harassment, abuse and exploitation, and intoxicating substances policy
- Compliance with how we comply with the Modern Slavery Act 2015
- Protecting children and vulnerable people
- (Local) Environment
- Health, Safety and Security (Operational Security is dealt with in separate Country Operational Security Strategies)
- Crosscutting: Zero tolerance and Reporting

2.2.1 Who this policy applies to, and when

This policy and its successors apply to all CGA staff, associates, and sub-contractors [described hereafter as ‘colleagues’] working for CGA in any country of work and on any project; a summary clause is included in all our contracts for this purpose. It applies to circumstances in which colleagues could be reasonably perceived as representing the company: this can include both on- and off-duty time in countries in which we work.

Where we subcontract other organisations, their colleagues working for and with us must abide by this policy.

Where others work or travel with us – as for example when host government or client staff are co-located or travel with CGA colleagues, or are funded by us to travel for a project, we expect them to abide by this policy.

CGA colleagues should report any behaviour, by any of these groups, which doesn’t match this policy to their line manager, country manager or safeguarding focal point, as per section 3.1.2.

Definition

Where we refer to “people assisted or to be assisted” in this policy, the term encompasses:

- people directly assisted or to be assisted (eg cash transfers recipients)
- immediate family of people directly assisted or to be assisted
- any member of aid-dependent/aid-recipient communities, specifically including documented refugees and people living in protection of civilian camps

2.2.2 Policy Awareness

Colleagues will be made aware of standards of behaviour expected of them on any contract. In addition to requiring signature to confirm commitment to the current Positive Business, Ethics and Conduct Policy, CGA will provide access to the following documents to all colleagues through our G-drive:

- Bribery Act 2010
- US Foreign Corrupt Practices Act

- OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions
- UK Equality Act 2010
- ILO Ethical Trading Initiative Base Code
- UK Modern Slavery Act 2015
- Operations Manual
- Security Documentation for countries they work in

Senior Management may approve further language on policies related to ethics, anti-corruption, anti-discrimination, bribery, conflict of interest, and/or child and vulnerable adults' protection (including human slavery and trafficking), bullying, harassment, abuse and exploitation, drugs and alcohol, health, environment, safety and security, as related to specific project and/or clients.

2.2.3 Review and updating

The CGA Board sets this policy and reviews this annually, or more regularly as needed.

2.3 Detailed Policies

2.3.1 Conflict of Interest

Colleagues must disclose, and manage, any known, potential, perceived, reasonably perceivable, or actual conflict of interest in any present or future task as soon as it arises, specifically including:

- Related-party
- Family
- Self-review
- Situations where the company could be considered to have an unfair advantage, or improperly be on 'both sides of a transaction'

A Conflict of Interest (COI) 'register' will be kept by CGA's Back Office Manager for colleagues across the company who should disclose in writing to the Country Coordinator and Back Office Manager if and when potential COI arises. For relevant senior staff with familial relationships that could be perceived as a potential COI, CGA may publish standing disclosures on its website. A standing register of interests for Directors and senior colleagues will be established during 2018.

In cases where there is a COI (perceived or actual) in our recruitment, we will address this by ensuring it is:

- Disclosed to all relevant parties;
- Discussed in terms of its nature and potential scope, and;
- Mitigated by taking all action agreed necessary

In any case of doubt, recourse should be to Country Coordinators, the Managing Director and to the Senior Compliance Adviser.

2.3.2 **Anti-fraud and anti-corruption**

Colleagues must comply with all applicable laws, rules, and regulations including but not limited to the DFID Statement of Priorities and Expectation, UK Bribery Act 2010, the US Foreign Corrupt Practices Act, relevant local legislation, and where appropriate, the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions.

Detailed arrangements to provide positive assurance are set out in the company's Operational Manual and Country Operational Notes, including but not limited to:

- Timesheets
- Expenses
- Procurement
- Project value amounts (transfers, grants etc)

Details on reporting arrangements are provided at section 3 below.

2.3.3 **Value for Money**

We are committed to seeking to maximise development impact and value for money.

Colleagues must take care to ensure that their actions are consistent with this policy, with the DFID Statement of Priorities and Expectations (irrespective of donor/funder) and with the donor/funder's requirements on Value for Money. Where there is a difference of requirement, the higher bar will be deemed to prevail.

Only colleagues who have assigned commercial responsibilities may engage on external commercial matters: see detailed arrangements set out in the company's Operations Manual.

In relation to reasonable reward, rent-seeking behaviour, and the seeking of 'ransom strips' is specifically forbidden. Our 'technology approach' published on our website sets out ways in which we ensure that we seek only reasonable reward for the development and support of technology materials and systems.

We are honest about what work we can and can't handle (e.g. we don't staff people that can't do the job to the required standard), and charge prices that are transparently set, and regularly benchmarked.

2.3.4 **Recruitment and Equalities**

We work only on the basis of performance, and potential. We recruit against objective criteria. We comply with applicable UK and host country Equalities

legislation, including the UK Equality Act of 2010. This means we do not discriminate against anyone because of age, disability, gender, marriage/civil partnership, pregnancy and maternity, race, religion and belief, sex, sexual orientation or socio-economic status. Where there is a conflict of laws in this or any other respect, UK law will be deemed to prevail.

We also endeavour to foster an inclusive workplace culture and actively seek to achieve diversity through our recruitment and management practices, specifically in terms of:

- A team in which the communities in which we work are well represented
- Specific opportunities for young people to progress in international development work, and for people from the Global South to work in international development in and beyond their own countries

In cases where there may be a COI (perceived or actual) in our recruitment, we will address this by ensuring it is:

- Disclosed to all relevant parties;
- Discussed in terms of its nature and potential scope, and;
- Mitigated by taking all action agreed necessary

2.3.5 Responsible Working Practices

We behave and communicate demonstrating mutual respect, in terms of content and expression (whether written or spoken), both internally and externally, and maintaining focus on the poor.

Specifically:

- Bullying and harassment can be (intentional) “behaviour that makes someone feel intimidated or offended”, according to the UK Government’s definition.ⁱⁱ If this behaviour is linked to a person’s identity, then this can constitute harassment which is illegal under the Equality Act 2010. We abide by the 2010 Equality Act; we are also fully committed to upholding the right to free speech.
- We do not tolerate bullying, harassment, exploitation or abuse of anyone by any of our colleagues, within or outside of working hours. For the avoidance of doubt, we do not tolerate colleagues seeking or engaging in transactional sex, i.e. sex in return for money, goods or other economic benefit, particularly in contexts and situations where there is an imbalance of power. Sexual/ intimate partner relationships between colleagues should be reported both to the

ⁱⁱ <https://www.gov.uk/workplace-bullying-and-harassment>

relevant country coordinator and the safeguarding point of contact. This is because: i) a relationship between two colleagues in line of management, or of significantly different grade, may be based on imbalance of power, and/or create a conflict of interest. In these situations, the responsibility lies with the senior colleague to report, although management will discuss separately with the junior colleague separately to ensure that nothing that could constitute harassment, bullying, exploitation or abuse has taken place, and to address any possible conflict of interest.

- We do not allow sexual relationships between our staff and people assisted or to be assisted since they are based on inherently unequal power.
- Colleagues are expected to work without being under the influence of intoxicating substances not prescribed or which otherwise impede their ability to carry out their duties to an acceptable professional standard.
- Due to the specific nature of work in FCAS contexts, particular prudence is required, and a matter of being a good colleague, in terms of personal physical and mental health; specifically:
 - limited access to medical services means that colleagues must take responsibility for ensuring they have sustainable access to any medication/medical services they need
 - limited access to medical services means that in some cases it is sensible to move location on a precautionary basis
 - in some cases, it will be necessary for colleagues to disclose more about their physical and/or mental health to other colleagues than they might need to in a Global North working context
 - there may be some genuine operational requirements that constrain safe access to some locations for people with disabilities
 - 'burn-out' of people working in FCAS locations is a well-evidenced, but diverse, and poorly-understood, phenomenon; the company is committed to taking reasonable and responsible steps to reduce the risk, and mitigate, including:
 - Protecting non-working hours – and a general policy of minimising email from mid-day Saturday to early morning Monday
 - Encouraging colleagues to take their leave, and enabling them to be away from corporate email while on leave
 - Giving staff diverse work responsibilities and building a portfolio of skills
 - Proactively managing rotation of staff between locations,
- Colleagues are expected to adhere to the responsibilities of their roles as defined in the company's operational security strategy for the country they are working in.

Treatment of people assisted/to be assisted and stakeholders.

As per the Introduction, we are committed that our work should help not harm, deliver for the poor, and for those (donors and others) who wish to support them,

In the course of our work (paid and pro bono), in situations where the SPHERE standards apply, they prevail. In particular, this means the Humanitarian Charter, Minimum Standards in Humanitarian Responseⁱⁱⁱ, and Protection Principles.

SPHERE is a voluntary initiative (without membership), consisting of humanitarian agencies, to improve the quality of humanitarian assistance and the accountability of humanitarian actors to their constituents, donors and affected populations.^{iv}

Overview of Sphere standards applicable to CGA’s work in humanitarian contexts		
Core Standards	Humanitarian Charter	Protection Principles
<ul style="list-style-type: none"> • People-centred humanitarian response • Coordination and collaboration • Assessment • Design and response • Performance, transparency and learning • Aid worker performance 	<ul style="list-style-type: none"> • The ethical and legal backdrop to the Protection Principles and the Core and minimum standards that follow in the Handbook. It is in part a statement of established legal rights and obligations; in part a statement of shared belief. 	<ul style="list-style-type: none"> • Avoiding exposing people to further harm as a result of your actions • Ensure people’s access to impartial assistance – in proportion to need and without discrimination • Protect people from physical and psychological harm arising from violence and coercion • Assist people to claim their rights, access available remedies and recover from the effects of abuse

Although CGA is not, strictly defined, a humanitarian agency, much of our work is conducted in conflict-affected and/or fragile states. Even in development contexts, poverty and vulnerability are closely linked. As such, these standards underpin our work in all contexts.

In all our work, CGA colleagues are expected to work in a safe and ethical manner that embodies the humanitarian imperative Do No Harm. This includes respecting the ethical principles of confidentiality and informed consent, especially when interacting with communities and beneficiaries at the household level. Colleagues must avoid raising expectations unduly when interacting with beneficiaries and stakeholders, and prevent any harm that might be due to participation in our projects.

ⁱⁱⁱ <http://www.spherehandbook.org/>

^{iv} <http://www.sphereproject.org/about/>

2.3.6 **Modern Slavery Act 2015**

The Company notes and is committed to the principles set out in the Modern Slavery Act 2015. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. As and when we have new contractor or supplier partners begin work with us we will pre-qualify any new firm through a series of due diligence steps, relating to company performance, compliance, and references.

2.3.7 **Protecting children and vulnerable people**

Colleagues must take all reasonable steps to protect children and vulnerable people, to recognise child and vulnerable people's protection, and seek to limit or eliminate situations where physical or emotional abuse, or other forms of maltreatment of children and vulnerable people can occur.

It is not expected that colleagues identify protection cases unless they are qualified to do so, but safeguarding concerns (actual or potential) should be raised through the stipulated reporting chain (see Section 3).

In the normal day-to-day duties of colleagues there is limited contact with these groups. However, recognising that working in the education, health and social protection sectors can entail visits to schools and health facilities, that our pro-bono work may take us into schools and other places where young or vulnerable people are, and that a wide range of situations can arise working in post-conflict and emerging countries, this policy for the protection of children and vulnerable adults has been put in place.

Definition

Consistent with the pro-poor and developmental purposes of the company, Charlie Goldsmith Associates is committed to safeguarding the welfare of:

- children, defined as anyone under eighteen years old, and
- Vulnerable adults, defined as someone 18 or over who is unable to care independently for themselves or unable to protect themselves against significant harm or exploitation. This could be due (but is not limited) to a physical or learning disability; illiteracy; illness or injury or mental health issues; old age; substance addiction; domestic violence or abuse; extreme or relative poverty; ethnicity or political or religious beliefs (e.g. in the case of civil conflict); or other reasons. It can be a temporary or a permanent condition.

Principles

- Children and vulnerable adults should be treated with care, respect and dignity.
- Those working for CGA in a given country should expect to be perceived by children and vulnerable adults as representing the company, whether in work hours or not.

- Employees should act responsibly with regard to any physical contact with children and vulnerable adults.
- All CGA Associates have signed a personal declaration form, and, where such services exist, are required to provide a disclosure and barring or equivalent service reference, see below. All subcontractor organisations will be made aware of our policy and asked to provide a copy of their own. If they do not have their own, or it does not meet our standards, they will be asked to conform to ours.
- For the purposes of the self-declaration form, the above definitions of children, vulnerable adults and people assisted/to be assisted apply

CGA Personal Disclosure

All CGA Colleagues will be asked to sign a personal disclosure form to confirm they have not committed any offence, been convicted of any offence, are not subject to any disciplinary sanction, relating to children or vulnerable adults, and have not committed any act that would count as a breach of this policy.

For colleagues who are nationals of residents from countries that offer a disclosure and barring service (formerly known in the UK as Criminal Records Bureau check) CGA will ask them to obtain the relevant paperwork every three years, at the company's expense. A full initial pass was conducted in 2016. Going forward, this will be done for all new colleagues as they join, and serving colleagues will be asked to renew their clearances every three years.

CGA Contractual Obligation

Colleagues will abide by the Company's standard on ethics which includes - where and when applicable, recognising children and vulnerable people's protection, whereby colleagues are obligated to at least report, and as far as possible to limit or eliminate situations where physical or emotional abuse, or other forms of maltreatment of children and vulnerable people can occur. It is not expected that Colleagues identify protection cases unless they are qualified to do so, but concerns about actual or potential concerns should be reported to senior staff - either the country manager or safeguarding focal point.

Responsibilities of CGA Colleagues in all work involving contact with children and vulnerable adults:

- Prioritise the safety and wellbeing of a child or vulnerable adult (C&VA).
- Obtain and record appropriate consent for work with children or vulnerable adults - from parents, guardians, teachers, carers etc, and from the children or vulnerable adults themselves, and with specific consent for the particular engagement, and use of any information, proposed. Specifically do so with regard to materials for external use in which children or vulnerable adults could reasonably be individually identified. Comply with GDPR.
- Not, as far as possible, assume sole responsibility for a child or vulnerable adult when on company work.

- Only take on practical caring responsibilities, for example, taking a C&VA to the toilet, in an emergency.
- Never give out personal contact details to a child or vulnerable person unless it is for the purpose of their contribution to a project, and after gaining permission from them and their parent/guardian.
- Never have a telephone conversation with a child without their parent/guardian/teacher being present with the child.
- Never lose sight of the fact that they are with children or vulnerable people – they will behave appropriately and use appropriate language at all times.
- Listen and show respect to children and vulnerable people.
- Avoid favouritism, and treat children, young and vulnerable people fairly and without prejudice or discrimination.
- Never develop inappropriate relationships with children, young people or vulnerable adults.

If they are concerned anyone is behaving inappropriately around children or vulnerable people, they must report that concern to both their Country Coordinator and CGA's Safeguarding point of contact, as per Section 2.4.2.

2.3.8 (Local) Environment

- CGA appreciates the importance of protecting the local environment where we work.
- Wherever possible, CGA will adopt a 'Do No Harm' approach while aiming to have a positive impact on the surrounding environment. This will include taking practical steps to minimise waste and limit pollution, e.g. through reusing and recycling and using the least damaging methods of waste disposal, and obtaining power and water available and practical
- Colleagues are expected as much as possible to follow suit.

2.4 Crosscutting: Zero tolerance and reporting

2.4.1 Zero tolerance

Zero tolerance means that we report and follow up every incident that is not, appears not to be, or is reasonably believed not to be, compatible with our ethics and conduct policy.

The logic of a 'zero tolerance' approach is that:

- What gets measured, gets managed
- Prompt follow-up of any smaller incidents stops problematic behaviours or approaches before they become bigger
- The open and comprehensive approach creates better understanding of what problematic behaviours and approaches are

An unintended consequence of zero tolerance approaches can be a reluctance to report. We therefore apply 'no blame' culture where reports are promptly, fully, and honestly made, for both incidents and near-misses. The company seeks to provide a structured and comprehensive process to receive and follow up on reports to allow them to be handled fairly; this is intended to provide a positive incentive to report.

3 Reporting

Every incident that is not, appears not to be, or is suspected not to be, compatible with our ethics and conduct policy, is to be reported internally and, where appropriate, externally to national authorities in, as relevant, host, sending and funding countries. If there is any conflict between UK and host-country laws, UK law will be deemed to prevail and determine reporting.

3.1.1 Fraud and Corruption

All colleagues are required to report any incidences of suspected fraud or corruption as soon as they become aware of them. The immediate Country Coordinator shall be the first point of reporting in any instance, who will then inform the CGA Managing Director except in cases where the Country Coordinator is involved, in which case concerns should be raised direct to the MD.

In the case of a potential compliance problem, CGA staff and associates should raise the issue immediately with the relevant Country Coordinator or the Managing Director. This includes any problems within CGA's own operations, in those of subcontractors or organisations that work for us, and within consortia or with clients with which CGA works. 'Near-misses', as well as actual occurrences, should be reported.

If for whatever reason the problem cannot be raised with the Country Coordinator, it should be raised instead, in order of preference, with:

- Managing Director, Charlie Goldsmith
(charlie@charliegoldsmithassociates.co.uk);
- Senior Compliance Adviser, Marcia Marini
(marcia.marini@ancoraconsulting.co.uk; or
- Board Chairman, Adrian Foster (adrianfoster0@gmail.com).

Every incident involving a donor's funds is reported to that donor promptly, whether or not it involves us directly. Every incident needs to be followed up in accordance to our zero-tolerance approach.

3.1.2 Children and vulnerable adults' protection

Where the safety of children and vulnerable adults is concerned, CGA will ensure that associates and sub-contractors are alert to signs of abuse and aware of their responsibility and the procedure to internally report suspected or known instances.

CGA recognises that not all of its staff, associates, and/or subcontractors will have the expertise required to identify all cases concerned; however, it is expected that individuals act and report concerns about actual or potential cases to the Country Coordinator, and to the senior management team member responsible for the Safeguarding of children and vulnerable people (Safeguarding@charliegoldsmithassociates.co.uk): Hannah Graham is the current safeguarding focal point.

Colleagues are encouraged to report such incidences through a no-blame culture and will be able to do so in confidence.

The Country Coordinator and Safeguarding Point of Contact should both be the first point contact for reporting (unless one of them is implicated in the report and the staff member does not feel comfortable including them). They will then inform the CGA Managing Director. In cases where e.g. both the Country Coordinator or Safeguarding Point of Contact is involved, concerns should be raised direct to the MD.

3.1.3 Responsible working

Concerns about staff conduct or wellbeing in this area should be raised with the Country Coordinator, Safeguarding Point of Contact and Managing Director (unless one of them is implicated in the report and the staff member does not feel comfortable including them), who will assess the associated risks and form a follow-up plan, briefing the wider Senior Management Team.

3.2 Internal CGA Procedure

Principles:

- Whistleblowers and reporters acting in good faith will not suffer adverse consequences of their reporting, in order to ensure that we maintain a culture of transparency and that necessary reports are made and acted on to uphold this policy.
- Follow-up procedures (including investigations or disciplinary action) will be conducted transparently in line with our Operations Manual so as to ensure accountability, with an internal reporter being updated on any findings or outcomes, as well as external partners.
- Due process is to be followed:

- if an allegation of a breach of this policy is made, the person who is alleged to have breached the policy must know what it is they are alleged to have done, and have full opportunity to respond
- in any circumstance where someone is to be removed from a duty pending follow-up of an allegation, it must be made clear that this is without prejudice

3.3 External Reporting

Every incident needs to be followed up, in accordance with our zero tolerance policy in a transparent and accountable manner.

Once a complaint has travelled through the internal channels, the MD, in consultation with either the Country Coordinator, Senior Compliance Adviser or the Safeguarding Point of Contact (dependent upon the nature of the report), will report incidences to relevant national authorities (in cases where relevant laws do not conflict with UK law) and development partners.

Where we are subcontracted, we will report to the prime contractor in accordance with our contract; however, obligations and commitments in regard to reporting to donors and/or national authorities re safeguarding, counter-fraud and corruption, and maximizing development value, will be deemed to prevail over any contractual restrictions.

Reports which relate to a donor's project will be made to the donor (in the case of DFID, reports can be made to: reportingconcerns@dfid.gov.uk). Where it appears that a reported action under the policies above involved a breach of the law of the sending, donor or host country, the MD will escalate such reports to national authorities. Rare exceptions to this rule may be made upon guidance from donors, or in cases where such action might violate an individual's rights.

With regard to fraud or financial crime relating to DFID projects, we follow procedures laid out in DFID's Suppliers' Code of Conduct, including:

'procedures setting out how, staff involved in DFID funded business, can immediately report all suspicions or allegations of aid diversion, fraud, money laundering or counter terrorism finance to the Counter Fraud and Whistleblowing Unit (CFWU) at fraud@dfid.gov.uk or on +44(0)1355 843551'

We expect to pro-actively adopt staff vetting and referencing measures and systems (including "humanitarian passports") expected to be introduced by the UK Aid sector during 2018.

3.4 Briefing out, oversight, and maintaining compliance

As set out above, colleagues must confirm acceptance and understanding of this policy on joining, and on a yearly cycle thereafter.

A yearly round of trainings will be offered.

The safeguarding coordinator will receive specialist training to enable them to discharge this role.