



CBM Code of Conduct

December 2018



Overview and Context

The purpose of this Code is to state CBM's commitment and define conduct which is ethical, legal, and consistent with the organisation's values, mission and professional standards. This Code outlines and gives general guidelines to all CBM employees for conducting themselves in a manner that upholds and maintains CBM's Core Values and Mission Statement.

This Code is binding for:

- All CBM employees worldwide
- Family members accompanying employees stationed or travelling abroad
- CBM board members and Third Parties (i.e. donors, VIPs, celebrities, free-lancers, volunteers, consultants and media, etc.) on CBM related business

Thus, this Code applies in the context of the relationship with CBM and third parties acting as its representatives.

The Code is in line with current international standards and CBM's policies and guidelines, such as:

- Universal Declaration of Human Rights
- Humanitarian Charter
- Accountability Charter of INGOs (International Non-Governmental Organisations)
- Code of Conduct of IFRC (International Federation of Red Cross and Red Crescent Societies)
- CBM Values
- CBM Mission Statement
- CBM Policy Preventing Corruption and Fraud
- CBM Inclusion Policy Framework
- CBM Safeguarding Policy
- CBM Safety and Security Policy
- CBM IT Guidelines

The Code defines what is commonly acceptable and appropriate behaviour within CBM's organisational culture. Non-compliance with the Code can result in disciplinary action.

Guiding Principles

1. CBM opposes and does not act as a willing party to wrongdoing, e.g. corruption, bribery or other financial impropriety, safeguarding abuses, personal misconduct, or illegal acts in any of its activities. CBM ensures accountability and transparency to its donors, partners, beneficiaries and other stakeholders.
2. CBM takes prompt and firm disciplinary action whenever and wherever wrongdoing of any kind is found among its personnel.
3. CBM personnel are expected to conduct themselves in a manner that reflects honesty and integrity, and that maintains the effectiveness, values and mission of the organisation. These standards of conduct are maintained despite possible prevailing contrary practices elsewhere.

Standards of behaviour

While it is not possible to list all the forms of behaviour that are considered acceptable or unacceptable, the following is a partial list of the kinds of behaviour or conduct that are expected and that are to be actively promoted:

1. Treating others with respect, dignity and impartiality regardless of gender, ethnicity, religion, sexual orientation and whether or not they have a disability¹;
2. Ensuring adherence to disability inclusive practices and avoiding practices which force or infer exclusion;
3. Behaving in an honest, trustworthy and ethical manner;

¹ Article 18 of Universal Declaration of Human Rights: Everyone has the right to freedom of thought, conscience and religion; this right includes freedom to change his religion or belief, and freedom, either alone or in community with others and in public or private, to manifest his religion or belief in teaching, practice, worship and observance.

4. Trustworthy handling of confidential and sensitive information and data;
5. Showing respect and adherence to the culture and law of the host country, whether professional or private, and avoiding any behaviour which may be considered offensive or even jeopardise the safety of colleagues, family members and/or oneself;
6. Adhering to applicable laws and CBM policies;
7. Adhering to safety, security and health rules and standards;
8. Wearing appropriate attire (clothing, accessories, etc.) that respects local custom;
9. Responsibly managing CBM assets, funds or other property and aiming to achieve environmental best practice (e.g. in terms of waste disposal, energy use)

Besides following these standards personally, CBM employees are also held accountable for the behaviour of others where they act as hosts, receiving and entertaining guests or visitors in CBM rented premises (residence and office) or make use of CBM vehicles or other assets.

Forms of Unacceptable Behaviour

Some forms of behaviour that are considered unacceptable, such as the partial list indicated below, may result in disciplinary action, up to and including termination of employment:

Protection of Vulnerable Persons

The following principles of sexual behaviour outline international standards for safeguarding of vulnerable people and are considered an integral part of the Code and in line with CBM's Safeguarding Policy:

1. Sexual relations with and exploitation of children are illegal, destructive to the child and harmful to CBM's work and reputation;

2. Sexual exploitation² and sexual abuse³ by any CBM employee or CBM visitor constitute acts of gross misconduct and are, therefore, grounds for termination of employment and legal action;
3. Sexual activity between any CBM employee and a child (person under the age of 18) is strictly prohibited, regardless of the age of majority or age of consent locally. In such cases, mistaken belief by any CBM employee or visitor regarding the age of a child is not a defence against disciplinary action, termination of employment and legal action;
4. Exchange of money, employment, goods, or services for sex (including sexual favours or other forms of humiliating, degrading, or exploitative behaviour) is strictly prohibited and is a reason for termination of employment;
5. Sexual relationships between any CBM employee or visitor and beneficiaries are not acceptable and will not be tolerated since they are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of CBM's inclusive development work;
6. Where a CBM employee or visitor develops concerns or suspicions regarding sexual abuse or exploitation by a fellow CBM employee, s/he must report such concerns via CBM's established reporting mechanisms.

Sexual Harassment

7. Sexual harassment, which may be manifested through unwelcome sexual advances, requests for sexual favours, inappropriate comments and other verbal or physical conduct of a sexual nature.

Fraud and financial impropriety

8. Financial impropriety in any form, including (but not limited to) bribery;

² Sexual exploitation is defined as any actual or attempted abuse of 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

³ Sexual abuse is defined as actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions

9. Theft, misappropriation or inappropriate removal or possession of any assets, funds or other property belonging to CBM, an employee or a vendor;
10. Negligent or improper conduct leading to damage of CBM or third-party property;
11. Falsification of records

Favouritism

12. Hiring staff to the exclusion of other qualified persons and/or without following established CBM policies and processes e.g. favouring relatives, friends, or members of one's ethnic group;
13. Showing favouritism in the workplace (for example, showing an improper preference or allowing inappropriate factors to influence decisions regarding dealings with others, including suppliers, vendors, contractors and employees)

Alcohol and drugs

14. Being on CBM premises or at a CBM project or activity under the influence of substances such as alcohol or drugs, such that they impair one's ability to function, puts the employee or others at risk, and/or has the potential to negatively impact CBM as an organisation;
15. Use and/or possession of any illegal substances

Other unacceptable behaviour

16. Unlawful or dishonest activities, including conflict of interest;
17. Threatening violence or engaging in violent behaviour in the workplace;
18. Behaving in a disrespectful manner by, for example, forcing one's views upon others, being coercive, using inappropriate language, harassing or causing physical harm;
19. Any unauthorised absence;
20. Unauthorized use of telecommunications, including but not limited to telephones, mobile phones, copy and fax machines, internet, video systems, mail system, CBM letterhead stationery or other employer-owned equipment;
21. Using software without a valid licence or copying programmes or work-related data in order to make non-business use of them or pass them on to third parties;

22. Possession of dangerous and unauthorized materials, such as explosives, firearms, or other weapons

Personal Relationships between Employees

With regards to personal relationships between employees, in particular between employees who have a direct or indirect business reporting relationship, it is strongly advised that managers take into careful consideration the effects that such involvements could have. CBM generally refrains from any involvement in the private lives of individuals. However, there may be some circumstances in which it becomes necessary for managers to counsel or caution where there is a conflict of interest or a negative impact on job performance.

Furthermore, personal relationships of an intimate nature in the workplace can be potentially disruptive to job performance, may negatively impact others, may damage business relationships, and may have an adverse effect on careers and CBM's reputation as a harmonious workplace. Therefore, in the event that a personal relationship exists between employees who are in a supervisory or direct working relationship to one another, the employee who is in the position of greater influence or authority, must disclose their relationship to their line manager in order to find a solution, if the relationship may lead to a conflict of interest.

Conflicts of Interest between CBM Work and Outside Activities

CBM relies on employees using their good judgement in gauging their involvement in outside activities, and if necessary, raising any potential for conflicts of interest with their line manager.

What May Constitute a Conflict of Interest?

These examples may help to think through whether any potential exists for a conflict of interest:

1. Will the involvement negatively impact on performance in CBM?
2. Does it involve anything that competes or conflicts with the work at CBM?
3. Does it involve owning or leasing property that it is known CBM has an active or potential interest in?

4. Does it involve lending to or borrowing from a partner, beneficiary, donor or supplier of CBM?
5. Will any gift be received (more than a nominal value) or any entertainment / favours beyond what is associated with accepted business practice, or of any commission or payment of any sort in connection with the work for CBM?
6. Is CBM's name used in such a way as to lend weight or prestige to an individual's sponsorship of a political policy or cause, or to their endorsement of the product or service of another organisation?
7. Are any CBM documents used (e.g. partner, beneficiary, donor or employee lists) for furthering someone's private interests?
8. Is someone using his/her association with any educational, professional, philanthropic, social or recreational activities to the **detriment** of CBM's interests or reputation?
9. Are CBM funds or assets used to lobby a political party or candidate?

If, after considering any potential for conflict of interest, someone wants to do business with a CBM supplier, or use CBM's name in endorsing a cause or product or use the fact of his/her employment with CBM for private purposes, such an interest needs to be registered with the line manager and approved before any action is taken.

Acts that violate this Code and that are not brought to the attention of the line manager for approval ahead of time will be considered outside the scope of employment and may result in disciplinary action and legal sanctions being taken against those who breach them, including, where appropriate, the immediate termination of employment.

Outside Professional Affiliations

If someone is either already a director or board member with another organisation, or is invited to serve as such, this has to be declared to and cleared with the line manager. This also applies if someone is taking up additional employment outside of CBM.

A judgement is needed whether a material conflict exists or not exist in cases like:

1. a director or his or her relative has an interest in an outside firm which does business with CBM, or
2. a director is affiliated with an organization which receives CBM funding, or
3. a director may become involved in any other set of circumstances which seems to present a potential conflict of interest.

Reporting and Incident Management

All CBM employees are obliged to create and maintain an environment that prevents sexual harassment, sexual exploitation and sexual abuse and promotes the implementation of CBM's Code of Conduct.

CBM Managers at all levels have particular responsibilities to support and develop systems that maintain this environment.

All CBM employees and CBM-affiliated persons (including visitors) have the obligation to report suspicions or evidence of conduct which violates or is inconsistent with the standards described in this code of conduct. CBM will adhere to policies and practices to guide their investigation of reported conduct and any resulting disciplinary action. Such policies and procedures ensure that this reporting can be done confidentially and without retaliation to the reporting person.

CBM (management or board, as appropriate) reserves the right to determine, based on this Code of Conduct and with reference to international standards, whether an employee or anyone working on behalf of CBM International has engaged in inappropriate conduct or behaviour that may warrant disciplinary action up to and including termination.

There are various channels for employees, external stakeholders and CBM-affiliated persons to report on any breach of this Code. While CBM encourages everybody to report a violation, a suspected violation or other inconsistency in observance of the Code, CBM employees have an obligation to report, if reasonable in the respective case. The main systems for feedback are listed below:

- 1.** All CBM employees can give feedback at any time by simply **reporting through the management line.**

- 2.** The **Programme Development Feedback System** welcomes concerns, complaints, suggestions or compliments on our operations and conduct as an organisation. External stakeholders related to CBM's programme work are invited to give their feedback about the standards of service provided by the organisation, its employees, volunteers or anybody directly involved in programme delivery (to be found on www.cbm.org under section 'Accountability and Reporting' along with a position paper).
- 3.** The **Whistle-blower System** aims to prevent, detect and follow-up on cases of:
- a. Bribery and corruption;
 - b. fraud, embezzlement and theft;
 - c. safeguarding;
 - d. abuse and sexual harassment;
 - e. nepotism;
 - f. other violations of legal requirements;
 - g. other substantial violations of internal regulations;
 - h. violation of data protection regulations
- A protected area on cbm.org allows everybody to anonymously report irregularities or risks by completing a structured report format. The software used allows an ongoing anonymous dialogue between the whistle-blower and CBM, as well as a structured case management (to be found under www.cbm.org under section 'Accountability and Reporting').
- 4.** There is one contact email by which the public is enabled to contact CBM. It can be found on www.cbm.org/contact as well as in certain CBM publications and is aimed at receiving general enquiries: contact@cbm.org. However, if any complaint was sent to it, it would be forwarded to the appropriate complaint system.

- 5.** Since CBM has specific policies on Safeguarding, all other entry points are aligned to report any violation against children or vulnerable adults immediately to either

the Crisis Management Team: cmt@cbm.org

or the Safeguarding Manager: safeguarding@cbm.org.

- 6.** Any tax-related violations can be reported to the CBM Tax Compliance Officer: TCMS_Officer@cbm.org

To ensure reporting without any fear of consequences, discretion and professionalism will be exercised at all times. The incident management is described in the guidelines of each feedback system.

Confidentiality:

Disclosures submitted under this Guideline will be considered confidential and will only be communicated on a need to know basis.

Conclusion

No set of specific rules can anticipate or capture every possible instance in which an issue of conduct may arise. Instead, one must be guided by the overarching principle that everyone is committed to positive, fair and honest conduct and uses his/her judgement and common sense whenever confronted with a practical issue.

CBM's ability to fulfil its commitments and maintain its reputation depends on individuals taking personal responsibility for promoting and adhering to the policies and guidelines set forth in this Code of Conduct.



More Information:

CBM
Christoffel-Blindenmission
Christian Blind Mission e.V.
Stubenwald-Allee 5
64625 Bensheim
Germany
www.cbm.org

CBM is an international Christian development organisation, committed to improving the quality of life of people with disabilities in the poorest communities of the world. CBM envisages an inclusive world in which all persons enjoy their human rights and achieve their full potential.