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INTRAC Code of Ethics



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ABBREVIATIONS AND TERMS

Staff	Refers to employees, contractors and volunteers. Contractors includes associates and external consultants with and through whom we deliver consultancies, research and training services.

1 EXECUTIVE SUMMARY

1.1 Purpose

This Code of Ethics lays out the fundamental ethical principles which INTRAC expects its trustees, staff and partners to follow.

1.2 Fundamental Principles

As a charity INTRAC upholds the following principles in all its work

- Beneficiaries first
- Integrity
- Openness
- Right to be safe

As a provider of professional services INTRAC additionally upholds the following principles

- Objectivity
- Professional competence and due care
- Confidentiality
- Professional Behaviour
- Environmental Protection

These are explained further in section 2.

1.3 These principles as part of a Code of Conduct

INTRAC is taking a principle based approach to ensuring we maintain the highest standards of ethical behaviour.

A principle based approach reflects the impact on ethical behaviour of an environment which is constantly changing. We undertake assignments in a wide range of geographical, cultural, legal backgrounds. Technology is also changing communications and the way we and our clients work. This means that it is not possible to provide a specific checklist of ethical behaviours and decisions that can be applied to every circumstance that we will encounter.

More detail of how this code of ethics relates to our code of conduct, including an outline of roles and responsibilities and details of related policies and other materials is given in section 3.

2 FUNDAMENTAL PRINCIPLES IN MORE DEPTH

2.1 Beneficiaries First

2.1.1 WHO ARE OUR BENEFICIARIES

INTRAC exists to support and strengthen civil society organisations.

Most of our funding is generated by the provision of services to clients who are generally organisations.

We are not a front-line deliverer of development programmes, but our work means that we may come into direct face to face or on-line contact with the beneficiaries of development programmes run by client organisations.

We provide training to individuals, including the trustees of client organisations, the employees of client organisations, or partners of client organisations.

We make materials available to other practitioners who share our passion for supporting and strengthening civil society.

INTRAC does not fundraise from the public, though we do accept donations towards the costs of material (eg reports and articles) which can be downloaded from our website.

INTRAC's beneficiaries are the individuals and the organisations that we come into contact with and who benefit from the services and resources we provide. In 'putting our beneficiaries first' we will prioritise vulnerable individual beneficiaries above organisational beneficiaries.

Individual beneficiaries include

- The trustees and employees, partners and beneficiaries of client organisations
- Trainees on courses and programmes
- The individuals who make use of our resources to support and strengthen civil society

2.1.2 BENEFICIARIES FIRST IN PRACTICE

INTRAC and those who work and volunteer with us will:

- Do the right thing by beneficiaries even if this might initially have a negative impact on the reputation or operation of INTRAC or its leadership.
- Ensure that the views and experiences of beneficiaries are actively listened to and taken into account in the way we deliver and review services, and in our communications.
- Ensure that all relevant policies and procedures are drawn up with the interests of beneficiaries in mind.

2.2 Integrity

INTRAC and those who work and volunteer with us will uphold the highest standards of institutional integrity and personal conduct at all times.

This means that we will

- Treat everyone with honesty and respect.
- Respect and value diversity.
- Build open relationships with everyone who comes into contact with us, whether as a client, supplier, trainee, or partner. These relationships may be with individuals or organisations.
- Work in ways that reflect our values

- Ensure that appropriate systems are in place to ensure that decisions are robust, defensible and free from conflict of interest
- Ensure our resources are managed properly, our funds are appropriately projected, applied and accounted for, including policies and procedures for combating the risk of bribery fraud and corruption
- Consider our responsibility to ensure that our activities do not harm the environment
- Contribute to more sustainable practices

2.3 Openness

INTRAC will work to ensure that everyone who comes into contact with us, as well as the wider public, can understand how we work, how we deal with problems as they arise and how we address complaints, as well as meeting our legal obligations

This means we will

- Seek to be open and transparent about how we work, sharing information about how we work in ways that are accessible to all
- Publish our
 - Annual Report
 - Approach to Safeguarding
 - Complaints procedure
- Establish clear lines of responsibility and accountability both internally and externally where applicable
- Report relevant incidents and share appropriate information with the responsible regulatory bodies, law enforcement and other statutory authorities as required

2.4 Right to be safe

Every person who volunteers, works for, or comes into contact with INTRAC will be treated with dignity and respect, and feel that they are in a safe and supportive environment

INTRAC will not tolerate inappropriate, discriminatory, offensive or harmful behaviour towards any person who volunteers, works for, or comes into contact with us. This includes the use of social media.

INTRAC seeks to be a place where well-being and mental health are valued and promoted, so everyone coming into contact with us is encouraged to invest in their own health and well-being at all times.

This means that we will

- Ensure that everyone working for, representing or in any way coming in to contact with us understands what is expected of them
- Stand against and have a clear approach to prevent abuse of trust and power including bullying, intimidation, harassment, discrimination and victimisation in all activities, including on-line activities
- Promote a culture that supports the reporting and resolution of allegations, suspicions and concerns about inappropriate behaviour and abuse.
- Train all trustees and staff in relevant ways on the conduct we expect from them. This training will be regularly refreshed.

- Ensure that everyone who works for or comes into contact with INTRAC has access to proper support if they
 - Experience or witness unacceptable behaviour
 - Raise a concern or make an allegation about the actions of others

2.5 Objectivity

INTRAC will not allow bias, conflict of interest or the undue influence of others to compromise our professional or business judgement.

This means we will

- Ensure that there is a clear separation between delivery (consultancy, research or training) and assurance (eg monitoring and evaluation) in work we undertake,
- Regularly review the extent to which we are reliant up specific customers eg by formal review and reporting on relationships with clients who make up a significant amount of our funding (>5%)

2.6 Professional Competence and Due Care

INTRAC will maintain levels of professional knowledge and skill at the level required to ensure that clients receive a competent professional service.

This means that we will

- Ensure staff that the staff involved in delivering services have the required knowledge and skills.
- Institute Quality Assurance in relation to both services and specific pieces of work for clients.
- Ensure all staff undertake appropriate professional development.

2.7 Confidentiality

INTRAC will respect the confidentiality of information acquired as a result of professional and business relationships. We will not disclose such information to third parties without proper and specific authorisation unless there is a legal duty to disclose. Neither will we use confidential information for organisational or personal gain.

2.8 Professional Behaviour

INTRAC will comply with relevant laws and obligations.

We will not make exaggerated claims for the services we are able to offer, the qualifications we possess or the experience we have gained.

We will respect the professionalism of our competitors and partners.

We will behave with courtesy and consideration towards everyone that we come in contact with in a professional capacity.

3 INTRAC'S APPROACH TO A CODE OF CONDUCT

3.1 Principles Driven Framework

INTRAC takes a principle based approach to ensuring we maintain the highest standards of ethical behaviour.

A principle based approach reflects the reality of living in a world where the environment in which we work is constantly changing. We undertake assignments in a wide range of geographical, cultural, legal backgrounds. Technology is also changing communications and the way we and our clients work. This means that it is not possible to provide a specific checklist of ethical behaviours and decisions that can be applied to every circumstance that we will encounter.

INTRAC recognises that this code of ethics on its own will not ensure that we maintain the highest standards of ethical behaviour. It is part of a framework that includes

- Risk Assessment to identify
 - circumstances where these principles may be violated
 - safeguards that can and should be applied to minimise these risks
- Guidance on application of the principles in relation to key/common risk areas. Existing and planned guidance and resources are summarised in section 1.5, and includes safeguarding, data-protection, due-diligence and health and safety.
- Clear and effective reporting processes for both risks and violations, eg through
 - line-management,
 - agenda items in meetings,
 - whistle-blowing, where appropriate,
 - external reporting mechanisms (eg statutory authorities and regulators).
- All trustees and staff will be given appropriate training, including appropriate refresher training on an annual basis. This will include
 - Formal sign off on these principles and an outline code of conduct upon induction, or when the code of conduct is amended to reflect new emerging risks
 - Including consideration of ethical issues as specific agenda items, eg in staff away-days

3.2 Roles and Responsibilities

3.2.1 TRUSTEES

Trustees are responsible for approving and reviewing this code of ethics and the various supporting policies and procedures that form the organisations code of conduct and drive our behaviours.

Trustees, along with the senior management team, set the tone at the top which drives organisational culture. As such they must be aware of and ensure that their behaviour is consistent with this code of ethics.

Trustees will review ethical risks and risk mitigation on a regular basis as part of their general responsibilities for risk management.

Trustees are responsible for ensuring that relevant matters are reported to statutory and regulatory authorities, though they may delegate the administration of reporting to an appropriate member of the management team.

3.2.2 MANAGEMENT

Management, particularly senior management, will lead by example. They will be aware of and ensure that their behaviour is consistent with this code of ethics.

They will strive to create an atmosphere in which all staff feel able to discuss and report ethical issues. They will also ensure that appropriate mechanisms are in place to allow fast-tracked reporting where delays could result in harm to beneficiaries or staff.

They will ensure that issues are appropriately acted upon. This could include proposing changes to existing processes, providing advice, seeking appropriate advice (either internally or through the use of external advisers), the use of formal disciplinary processes, escalating issues to trustees and acting on behalf of trustees to ensure appropriate reporting and follow up with statutory and regulatory authorities

3.2.3 STAFF

Note: staff in the context of this code and related codes includes employed staff, volunteers and contractors

All staff are expected to be aware of and act in accordance with the principles in this code of ethics.

Where specific guidance exists must follow that guidance.

They should report and discuss issues promptly with their line-management, or with an appropriate senior manager where the issue involves their line-management directly.

Where there is an immediate issue relating to safeguarding of vulnerable beneficiaries they should follow the safeguarding procedures.

3.3 Related Policies and Procedures

Related policies available on our website are

- a) [Code of Conduct – Employees](#)
- b) [Code of Conduct – Contractors](#)
- c) [Safeguarding](#)
- d) [Complaints and Whistleblowing](#)
- e) [Data Protection](#)
- f) [Conflict of Interest](#)
- g) [Anti-Bribery and Anti-Corruption Policy](#)
- h) [Due Diligence Checks](#)
- i) [Procurement](#)
- j) [Safety and security](#)
- k) [Health and Safety handbook](#) and [policy manual](#)

Additionally available internally for employees

- l) Employee handbook – code of conduct
- m) Register of gifts and hospitality
[S:\02 INTERNAL\Gifts and Hospitality Register\Gifts and Hospitality Register.xlsx](#)

4 APPENDIX: USEFUL RESOURCES

4.1.1 CHARITY CODE OF ETHICS AND CODES OF CONDUCT

[https://www.ncvo.org.uk/images/documents/policy_and_research/ethics/Charity Code of Ethics.pdf](https://www.ncvo.org.uk/images/documents/policy_and_research/ethics/Charity_Code_of_Ethics.pdf)

<https://corehumanitarianstandard.org/the-standard>

<https://www.icrc.org/eng/resources/documents/publication/p1067.htm>

<https://www.keepingchildrensafe.org.uk/how-we-keep-children-safe/capacity-building/resource-library>

4.1.2 BOND

https://www.bond.org.uk/sites/default/files/governance_good_practice_guide_for_trustees_on_safeguarding_for_website.pdf

<https://www.bond.org.uk/resources/safeguarding-policy-templates>

4.1.3 PROFESSIONAL CODES OF CONDUCT

<https://www.ifac.org/system/files/publications/files/2014-IESBA-Handbook.pdf>

<https://www.accaglobal.com/sg/en/about-us/regulation/rulebook.html>

<https://www.accaglobal.com/content/dam/acca/global/PDF-members/2012/2012c/CofEC.pdf>

4.1.4 UK STATUTORY AND REGULATORY REQUIREMENTS

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/752474/guidance_on_criminal_reporting_inc_overseas.pdf

<https://www.gov.uk/government/publications/strategy-for-dealing-with-safeguarding-issues-in-charities>

<https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity>

HISTORY AND REVISIONS

November 2018

First Draft: K Saxl

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Formally recognised Environmental Protection as a key principle.