

# **CBM Global Disability Inclusion: Code of Conduct**

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**June 2022**

## **1. Overview and Context**

This Code describes the objectives and rules that reflect our commitment to responsible, ethically irreproachable and legally compliant behaviour, that is consistent with the organisation's values, mission and professional standards.

The rules and guidelines defined by the Code of Conduct provide all of us with the necessary security and orientation in our day-to-day work. The Code of Conduct also communicates to our partners, project participants and the general public that CBM Global is a reliable, trustworthy organisation that combines high quality expertise and knowledge with a strong sense of responsibility. Only by maintaining our integrity and highest ethical standards at all times can we truly realise our vision and mission and live by our values.

CBM Global Code of Conduct also applies online, and we expect our employees to maintain the same values and standards of behaviour on social media as we expect in the office or in any other public space.

This Code is binding for:

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

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

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

- [CBM Global Values](#)
- 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.
- Humanitarian Charter
- Accountability Charter of INGOs (International Non-Governmental Organisations)
- Code of Conduct of the International Federation of Red Cross and Red Crescent Societies

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- [CBM Global Mission Statement](#)
- CBM Global HR Handbook
- CBM Global Policies and Processes
  1. [Accessibility](#) ([French](#) | [Spanish](#) )
  2. [Health, Safety & Security](#) ([French](#) | [Spanish](#) )
  3. [Environmental Responsibility](#) ([French](#) | [Spanish](#) )
  4. [Safeguarding of Children and Adults-at-Risk](#) ([French](#) | [Spanish](#) )
  5. [Prevention of Corruption & Fraud](#) ([French](#) | [Spanish](#) )
  6. [Counter-Terrorism & Anti-Money Laundering](#) ([French](#) | [Spanish](#) )
  7. [Whistleblowing](#) ([French](#) | [Spanish](#) )
  8. [Programme Feedback & Complaints](#) ([French](#) | [Spanish](#) )
  9. [Diversity & Inclusion](#) ([French](#) | [Spanish](#) )
  10. [Protection from Sexual Exploitation, Abuse and Harassment](#) ([French](#) | [Spanish](#) )
  11. [Grievance](#) ([French](#) | [Spanish](#) )
  12. [Disciplinary Process Guide](#)
  12. [Conflict of Interest & Loyalty](#) ([French](#) | [Spanish](#) )
  13. [Data Protection](#) ([French](#) | [Spanish](#) )

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

## **2. Guiding Principles**

- 2.1 CBM Global 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 Global ensures accountability and transparency to its donors, partners, beneficiaries and other stakeholders.
- 2.2 CBM Global takes prompt and firm disciplinary action whenever and wherever wrongdoing of any kind is found among its personnel.
- 2.3 CBM Global 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.
- 2.4 CBM Global employees are encouraged to hold each other accountable for compliance with the Code and to report any inappropriate behaviour.

### **3. Standards of Behaviour**

**These are the standards of behaviour that form part of everything we do:**

- 3.1 Treating others with respect, dignity and impartiality regardless of gender, ethnicity, religion, sexual orientation and whether or not they have a disability<sup>1</sup>;
- 3.2 Ensuring adherence to disability inclusive practices and avoiding practices which force or infer exclusion;
- 3.3 Behaving in an honest, trustworthy and ethical manner;
- 3.4 Showing respect and adherence to the culture and law everywhere we go, whether professional or private, and avoiding any behaviour which may be considered offensive (including comments and posts on private social media) or even jeopardise the safety of colleagues, family members and/or oneself;
- 3.5 We recognize that we are measured by our actions at all times and therefore call on our employees to respect the local culture and understand the issues of communities in which they work or visit. Besides following these standards personally, CBM Global employees are also held accountable for the behaviour of others where they act as hosts, receiving and entertaining guests or visitors in CBM Global premises (residence and office) or make use of CBM Global vehicles or other assets.
- 3.6 Responsibly managing CBM Global assets, funds or other property and aiming to achieve environmental best practice (e.g. in terms of waste disposal, energy use)
- 3.7 Trustworthy handling of confidential and sensitive information and data;
- 3.8 Adhering to CBM Global policies listed in section 1 of this document.

### **4. CBM Global behavioural commitments linked to this Code of Conduct**

Failure to comply with the CBM Global behavioural principles may lead to suspension of employment or a formal investigation, and if warranted, immediate dismissal.

#### **4.1 Protection of Vulnerable Persons**

CBM Global's priority at all times is that our project participants, employees and communities where CBM Global works are and feel safe.

All CBM Global employees are expected to speak up if they observe or hear about wrong doings or bad practices.

We require all members of staff to read, sign and comply with the Children and Adults at Risk Safeguarding Policy.

Staff must not post on social media, confidential information or put our staff, programmes, or the people we serve at risk and must abide by our general data protection requirements.

## **4.2 Prohibition of sexual exploitation and sexual abuse**

(Adapted from the UN's Secretary General's Bulletin: Special measures for protection from sexual exploitation and sexual abuse ref ST/SGB/2002/13)

CBM Global has a zero tolerance to any form of abuse. This section outlines the international standards for protecting vulnerable people from sexual exploitation, abuse and harassment.

1. Sexual exploitation and sexual abuse violate universally recognized international legal norms and standards and have always been unacceptable behaviour and prohibited conduct for CBM Global staff.
2. Sexual exploitation and sexual abuse constitute acts of serious misconduct and are therefore grounds for disciplinary measures, including summary dismissal;
3. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief in the age of a child is not a defense;
4. Exchange of money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour, is prohibited. This includes any exchange of assistance that is due to programme participants;
5. Sexual relationships between CBM Global staff and programme participants since they are based on inherently unequal power dynamics, undermine the credibility and integrity of the work of the CBM Global and are prohibited;
6. Where a CBM Global staff member develops concerns or suspicions regarding sexual exploitation or sexual abuse by a fellow worker, whether in the same organisation or not and whether or not within the CBM Global system, he or she must report such concerns via established reporting mechanisms;
7. CBM Global staff are obliged to create and maintain an environment that prevents sexual exploitation and sexual abuse. Managers at all levels have a particular responsibility to support and develop systems that maintain this environment.
8. The exploitation of children is illegal and destructive to the child and harmful to CBM Global's work and reputation;
9. 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, is prohibited.

The standards set out above are not intended to be an exhaustive list. Other types of sexually exploitive or sexually abusive behaviour may be grounds for administrative action or disciplinary measures, including summary dismissal.

## **4.3 Zero Tolerance with Harassment and Bullying**

CBM Global does not tolerate any kind of violence in the workplace, including but, not limited to threatening and intimidating behaviour. Each employee is required to contribute to an environment of respect that precludes any kind of harassment, including bullying, unwelcome sexual advances, unwanted physical contact, inappropriate propositions or a working environment tainted with harassing jokes, words or demeaning comments.

Online behaviour that promotes violence, abuse, prejudice, or discrimination is never acceptable.

All employees are required to read and acknowledge the content of the CBM Global Policy: Protection from Sexual Exploitation, Abuse and Harassment

#### **4.4 Condemning Abuse of Power**

All CBM Global employees and its representatives undertake to manage the power that comes with their position with appropriate restraint, and not abuse it.

#### **4.5 Non Discrimination**

We consider the diversity of our employees to be a real strength. We promote an inclusive work environment in order to attain the highest possible talent, creativity and efficiency. The main criteria for employee selection and promotion are skills and qualification. We do not discriminate or tolerate discrimination with respect to gender, race, religion, age, disability, sexual orientation, national origin or any other characteristic protected under law.

#### **4.6 Avoiding Fraud and Financial Impropriety**

CBM Global Policy on Prevention of Corruption and Fraud provides employees with clear guidance on what is expected from all members of staff when handling CBM Global's assets, information and business reporting.

#### **4.7 Contribute to everybody's Health and Safety**

CBM Global aims to provide a safe and healthy work environment for all employees and project participants.

By following health and safety guidance as described in CBM Global policy and procedures, all members of the staff contribute to a safe and healthy workplace.

The consumption of alcohol or drugs during working hours or working under their effects is prohibited, as this not only can put the employee's health at risk but also that of colleagues and project participants. Employee's actions can also damage CBM Global's reputation in the communities that we serve. Please refer also to CBM Global HR Manual on this topic.

#### **4.8 Social Media Considerations**

Being a CBM Global employee may bring extra external scrutiny to personal social media profiles, even if these are not explicitly linked to the organisation. Your personal social media presence is owned by you, but we ask you to recognise that to a greater or lesser extent we are all potentially representatives of CBM Global outside of working hours, online and offline.

All employees, trustees and volunteers must adhere to our Code of Conduct, [Link: Social Media Guidelines](#) and the law while on social media.

## 5. Conflicts of Interest

CBM Global is committed to a culture of integrity, transparency and accountability. All directors, staff, Board members, programme partners or volunteers are expected to observe high standards of business and personal ethics in the conduct of their duties and responsibilities.

When making decisions related to our work we have a duty to act in the best interests of CBM Global.

Identifying, avoiding, or disclosing and addressing conflicts of interest is an important part of demonstrating objectivity and integrity.

By signing adherence to this Code of Conduct, you are bound by the Conflict of Interest & Loyalty Policy

## 6. Reporting and Incident Management

All CBM Global employees and CBM Global-affiliated persons (including visitors) are expected to speak up and report if they observe or hear about wrongdoing or bad practices.

CBM Global will adhere to policies in section 1 of this Code to guide the investigation of reported conduct and any resulting disciplinary action. CBM Global's policies and procedures ensure that this reporting can be done confidentially and without retaliation to the reporting person.

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

1. All CBM Global employees can give feedback at any time by simply **reporting through the management line**.
2. There is one **general contact email** by which **the public** can contact CBM Global: [hello@cbm-global.org](mailto:hello@cbm-global.org). Inquiries sent to this address will be forwarded to the appropriate staff member to deal with the complaint.
3. On **safeguarding and sexual exploitation, abuse and harassment** matters, reports can be emailed to [safeguarding@cbm-global.org](mailto:safeguarding@cbm-global.org) or submitted using the online reporting form link, [EthicsPoint](#). For more information, please refer to the reporting and feedback procedures which accompany the CBM Global Children and Adults-at-risk Safeguarding Policy and Protection from Sexual Exploitation, Abuse and Harassment Policy.
4. Any **tax or finance related violations** can be reported to CBM Global Finance Director.
5. CBM Global has a **whistleblowing** policy which includes guidance on how to report sensitive issues where reporting through the management line may not be

appropriate or desired. Issues can be reported by email: [whistleblowing@cbm-global.org](mailto:whistleblowing@cbm-global.org) or using the Whistleblowing portal at this link: [CBM Global Whistleblowing Portal](#).

6. CBM Global welcomes programme feedback, concerns, complaints, suggestions or compliments on their operations and conduct as an organisation. External stakeholders related to CBM Global'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. Programme feedback can be sent to [feedback@cbm-global.org](mailto:feedback@cbm-global.org).

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

### **Confidentiality:**

*Disclosures submitted under this Code of Conduct will be considered confidential and will only be communicated on a need-to-know basis.*

## **7. Conclusion**

CBM Global'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.

There is no substitute for personal integrity and good judgement. When faced with a difficult situation, consider these questions:

- Is my action or decision legal?
- Does it comply with the letter and spirit of this Code and CBM Global values and policies?
- Is it right and free of any personal conflicts of interest?
- Could my action or decision withstand public review? What would it look like in a newspaper?
- Will my action or decision protect the reputation of CBM Global as an organisation with high ethical standards?
- If the answer to each question is "yes", the action or decision is most likely the correct one.
- If you are not sure, ask. And keep asking until you are sure!

### **CBM Global Disability Inclusion**

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