

CODE OF CONDUCT

VELA FOUNDATION

(FUNDACJA VELA, ORGANIZACJA HUMANITARNA NA RZECZ
OCHRONY I EDUKACJI)



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1. Introduction

The Code of Conduct is a fundamental document for the Foundation that defines the conduct and behavior of all management, directors, employees – permanent and freelance, volunteers, interns and other third parties that are involved in the service provision and in beneficiary management. The Code of Conduct defines the principles and procedures that take place for the effective and efficient operation of the Foundation with aim to provide the best possible service to the target groups and beneficiaries. In this code of conduct, the term “staff” refers to all staff members, management and others working, interning or volunteering with the Foundation.

Where it has an overseas presence, a Foundation country office or operation Code of Conduct may differ, for example with reference to national legislation, but are consistent in their commitment to standards and ethics. Foundation partners are required to ensure the safeguarding measures in their organizations meet the Foundation's standards.

2. Background

The Code of Conduct is endorsed by the Board and Council. Every attempt will be made to ensure that communities and beneficiaries have access to it and that it is presented in the appropriate channels. The Code of Conduct lays out the Foundation's expectations and guiding principles for appropriate behavior in the office and in the field. By agreeing to work for or with the Foundation, team members agree to comply with its policies and procedures and to uphold the highest standards of personal and professional conduct to ensure that the Foundation's integrity and reputation will not be jeopardized by their actions.

For employees of the Foundation this Code of Conduct is an integral part of their induction process and their conditions of employment. It is therefore an inseparable part of individual



employment contracts. Directors, volunteers, interns and visitors are also expected to read and sign it.

All those visiting the field will be briefed on the Code of Conduct prior to departure. All the Foundation's staff are responsible for encouraging, advocating, and promoting the Code of Conduct. They are also responsible for implementing, monitoring and enforcing its standards.

3. Basic Values And Principles

- Respect for the fundamental human rights, social justice and human dignity, and justice
- Respect for dignity and value of all human beings, respect for difference, and respect for the protection of personal and sensitive data
- Respect to all persons with no discrimination regarding race, gender, religion, convictions, ethnicity, citizenship, language, family situation, sexual identify, age, socioeconomic status, disability, political convictions or any other

4. Work Environment

Vela Foundation maintains a policy of equal treatment, equal opportunities and mutual respect among all employees, volunteers and others working in the framework of its operations. All staff, management and contracted parties fully comply with the mission, objectives and principles of the Foundation and strictly follow the present code of conduct. Anyone who feels they have not been treated accordingly has the right to report so. The Foundation will carry out all possible internal actions to resolve such issues. No member of



staff or management will be discriminated against, be subject to abuse or threat for reporting any incident against them or others.

All staff:

- Treat their co-workers and all persons involved with the Foundation with respect, fairly, with kindness and respecting their differences.
- dress and behave appropriately and in line with the work and role of the Foundation. All items of clothing will be suitable for the work environment and will not contain offensive or objectionable material (slogans or graphics)
- Contribute to a friendly and positive work environment based on mutual understanding and respect for each other's viewpoints and backgrounds.
- Abide by the Internal Operating Procedures of the Foundation and follow all policies and procedures. They work to achieve the Foundation's mission they exchange ideas and viewpoints and provide constructive feedback aiming to work as a team to achieve their objectives. Coordination and efficient communication are key for the success of the Foundation's work.
- Always offer assistance in a way that is impartial, non-discriminatory, and unconditional. The targeting of aid and selection of beneficiaries will be carried out according to thorough assessments and conclusions drawn up and agreed to by consensus of the partners' staff and of our partner organizations.
- The Foundation's structure exists to ensure that accountability flows up and down across all its activities. All employees must defer to team leaders and respect decisions delegated to them. Project Managers and team leaders are expected to consult with their teams before making and delegating decisions.
- Are dependable, recognising the commitment and responsibility to their assignment, accept assignments with an open mind and a willingness to learn and accept feedback from my supervisor in order to do the best job possible.



- Address ethical concerns by speaking directly with the colleague with whom they have the concern; and when necessary, report such to their Manager in the defined chain of command.
- report concerns with internal conduct to their immediate supervisor, who is obligated to address the issue and either explain or alter the offending behavior. If they do not feel comfortable raising this issue with an immediate supervisor, they will consult with the senior leadership of the Foundation to address any ongoing issues with the immediate supervisor.

5. Fair Treatment, Harassment And Discrimination

Blackmail and harassment are not accepted by any member of staff, management, board or other. The principle of equal opportunity is embedded in the Foundation's operations and all members of staff, management and board are expected to protect their peers against any such incidents.

Staff will abstain from any form of maltreatment against other, physical or verbal abuse, unequal treatment and favoritism at the workplace.

Any member of staff who believes they have not been treated as above should report such incident. The Foundation will carry out all possible internal actions to resolve such issues. No member of staff or management will be discriminated against, be subject to abuse or threat for reporting any incident against them or others.

Staff and management:

- will not engage in or tolerate any form of harassment in the workplace, including sexual harassment and abuse of power
- managers will not solicit favors, loans, or gifts from staff, nor will they accept unsolicited ones that are of more than a token value
- will recognize that there is an inherent conflict of interest and potential abuse of power in having intimate and sexual relations with staff under their supervision. They should be aware that the Foundation strongly discourages such relations. Should the staff and



management find themselves in such a relationship, they will resolve this conflict of interest without delay.

- They will not engage in or tolerate or engage in any form of harassment in the workplace, including sexual harassment, sexual exploitation or abuse of beneficiaries
- They will not harass anyone in the workplace on the grounds of any kind of diversity/difference
- Will not make gestures or sexual remarks about someone's body, clothing, or appearance
- Will not ask questions about someone's sex life
- Will refrain from making racism or sexually offensive jokes
- Will not make sexual comments or jokes about someone's sexual orientation or gender reassignment
- Will refrain from sexting and online bullying
- Will not make sexually suggestive remarks
- Will not make physical contact such as touching or pinching
- Will not abuse the power and influence that they have by their position over the lives and well-being of the beneficiaries
- Will never request any service in favour from the beneficiaries in return for protection or assistance
- Will never engage in any exploitative relationships, emotional, financial or employment related with beneficiaries
- Will not engage in sexual activity with children under the age of 18. Mistaken belief in the age of the child does not constitute a defense
- Will neither solicit nor engage in commercial exchange of sexual services as such relationships may undermine the credibility and the image of the Foundation



6. Conflict Of Interest

All staff commit to strictly avoid any conflict of interest that may arise before or during their involvement with the Foundation. Any such incident or allegation or will be immediately reported to the President or other member of Board or Council. All involved persons willingly declare their conflict of interest or potential conflict of interest to the President and the Board. No member of staff or management or other will vote or become involved in any discourse for procurement decision for which they have personal interest. Conflict of Interest arises in one or more of the following situations:

- The personal interest contradicts or hinders the interests of the Foundation
- A person is active or has interests that hinder the objective and effective implementation of their tasks and fulfilment of their role
- A person participates in activities that are not aligned with the mission and objectives of the Foundation
- Especially in cases of conflict of interest among Board or Council members, or staff, or volunteers who hold management or oversight positions or have the power to commit the Foundation vis-à-vis third parties, conflict of interest involves the following:
 - o Any relationship of shared ownership with any contractor or supplier or vendor of the Foundation
 - o Any relationship of consultant or work relationship with any vendor, contractor or supplier of the Foundation
 - o Any external business activity which hinders or undermines the possibility for effective and efficient response to the role and responsibilities of a person against the Foundation

All staff will:

- Implement their formal duties and their private affairs in such a way to avoid potential conflict of interest



- Work to promote the mission, values and objectives of the Foundation and ensure that their personal views, behavior and convictions (including political and religious convictions) will not hinder their formal role and responsibilities for the Foundation
- Their actions will be free of any personal interest or benefit and will counter any unjustifiable political pressure in decision making. They will not seek or accept any directive regarding the due implementation of their role and duties by any government or authority other than the Foundation. Any relation with a supplier or vendor or subcontractor or business ally, or partner etc., which may cause conflict of interest will be declared.
- Not accept any favor, gift, fee, decoration or bribe by any authority, nor will they accept any of the above by any source other than the Foundation without prior approval by the President.
- Not conduct any external activity or work without prior approval by the President. They will not accept complementary fees or remuneration by the state or other sources.
- Not receive or provide bribes including illegal remunerations of any kind.
- No member of the Foundation will vote or participate in any discourse for procurement decision making, upon which there is personal interest.
- Will not accept supplementary payments or subsidies from a government or any other source or participate in certain political activities such as standing for or holding public office without prior authorization.
- Will avoid assisting private persons or companies in their undertakings with the Foundation where this might lead to actual or perceived preferential treatment.
- Will never participate in activities related to procurement of goods or services, or in human resource activities, where a conflict of interests may arise.



7. Activities Countering The Values And Mission Of The Foundation

All staff will avoid any involvement in criminal or unethical activity, activity that violates human rights, or activity that threatens the interests of the Foundation. All staff strictly abstain from the use of addictive substances including alcohol during work hours.

All staff do not support or participate in any form of illegal, abusive or exploitative activity. They will refrain from any involvement in criminal or unethical activities, activities that counter human rights or activities that compromise the image and interests of the Foundation.

8. Provision Of Services

During provision of services at the premises of the Foundation or elsewhere, all staff interact with and address beneficiaries' concerns with kindness and respect and abstain from any intrusive or harassing behavior.

The staff:

- interacts with beneficiaries without discrimination on any terms i.e. based on race, gender, ethnicity, political views, disability, religion or other. They consider the experiences and background of beneficiaries and more importantly, their weak position in interacting with staff.
- considers the impact that their work and interaction with beneficiaries may have on their lives.
- is up to date with policies, objectives, activities and process of the Foundation's interventions.
- makes any effort to protect the rights of vulnerable groups and beneficiaries and counter any form of exploitation or harm on beneficiaries and other vulnerable individuals.
- Never exploits the vulnerability of any target group, or person/s to be put into compromising situations.



- Does not preach to anyone or pressure anyone to accept any political, cultural, or religious beliefs. Proselytisation is strictly prohibited.

9. Protection Of Personal Data And Confidentiality

Every person has the fundamental right to the protection of their personal data and privacy regarding their history and health. Every person has the right to control access to their personal data by others, and disclosure of their personal data through consent, withholding and retraction of their consent. For any non-consensual disclosure of confidential information, the staff should consider the necessity, proportionality and relevant risks. In any case, the Foundation and all staff comply with Regulation (2016/679) of the European Parliament and of the Council of 27 April 2016.

All staff and third parties interacting with beneficiaries, or their data are obliged to respect and protect the personal data of beneficiaries irrespective of the type of data handling, management, processing, sharing or others and irrespective of the form of the data i.e. written data, electronic data, photographic data, biological samples by which personal information is shared, managed, or stored. Electronic data are to be stored on the Foundation's online data platforms where supervisors will have direct access.

Volunteers are responsible for maintaining the confidentiality of all proprietary or privileged information to which they are exposed while serving as a volunteer, whether this information involves a single staff, volunteer, client or other person.

Staff and management:

- Will exercise due care in all matters of official business, and not divulge any confidential information about beneficiaries, colleagues and other work-related matters in accordance with the terms of employment and current guidelines.



- Will protect, manage, and utilize the Foundation's human, financial, and material resources efficiently and effectively, bearing in mind that these resources have been placed at the Foundation's disposal for the benefit of the humanitarian work that it implements

10. Conduct

All staff work and behave according to the following principles:

- Do not make use or exploit their power vis-à-vis the beneficiaries or others in a state of need
- Never engage in any form of exploitative relation i.e. sexual, personal, financial, or other with beneficiaries and persons seeking or receiving assistance
- Will make appropriate and mindful use of the Foundation's resources including personnel, financial, in-kind or other, for efficiency and effectiveness
- Will demonstrate integrity, truthfulness, dedication and honesty in their actions
- Will be patient, respectful and courteous to all persons with whom they deal in an official capacity, including persons of concern, representatives of operational and implementing partners, governments and donors
- Will observe local laws, will meet all their private legal and financial obligations, and will not seek to take personal advantage of any privileges that have been conferred on them in the interest of the Foundation
- Will to their utmost to ensure that the conduct of members of their household do not reflect unfavorably on the integrity of the Foundation
- Will show respect to all colleagues, regardless of status or position and will allow all colleagues the opportunity to have their views heard, and to contribute from their knowledge and experience to team efforts
- Will not record the content of any meetings without the express permission of the president and attendees



- Will not gossip about their colleagues or the organization as a whole. They will promote positive engagement with all employees and use formal channels to raise issues of concern they have with the organization
- Will respect their colleagues' privacy and avoid spreading misinformation. They will not have private conversations at the workplace which may distract others, or which may expose anyone to others' gossip.
- They will communicate openly and share relevant information (subject to confidentiality requirements) with other colleagues and will endeavor to respond in a timely manner to queries and emails
- Will use internal procedures and processes to express unhappiness or dissatisfaction and will not use social media for such purposes
- Though they might disagree with a colleague, or with a manager, they will seek to resolve differences and solve problems when they arise, and will contribute to building constructive dialogue, guided by mutual respect and an open, positive approach between management and staff representatives. They will accept that not all the changes which they wish to promote will necessarily be adopted by the Foundation.
- Managers will be open to the views of all team members, and will provide timely feedback on the performance of each team member through guidance, motivation, and full recognition of their merits.

The management:

- Are responsible for their exemplary conduct during and outside of working hours
- Will not participate or accept any form of harassment in the workplace including bullying, sexual harassment and exploitation of power
- Will be open to feedback by all members of staff and will revert on the performance of all staff members through guidance, incentives, and constructive feedback
- Will not request or accept any favors, loans or gifts from staff, nor accept offers that have significant value



11. Safety, Health And Welfare

Staff and management:

- Will remain aware of and comply with all instructions designed to protect their health, welfare and safety
- Will always consider the safety of staff in operational decisions
- If they have doubts regarding an instruction that they consider threatening to their safety or the safety of other persons, they will bring this immediately to the attention of their manager

12. Promotion And Communication

The Foundation:

- Selects images and messaging on the basis of fairness, solidarity and justice.
- Promotes every state or event in a specific and general context to facilitate public opinion in respect to reality and complexity of each issue
- Avoids the use of images and messages that may promote stereotyping or prejudice against certain people
- Makes use of images, messages and cases in full knowledge, participation and consent of involved or showcased persons or their legal guardians

The staff:

- Will abstain from any comments or discussion regarding the beneficiaries on media and will not give interviews or comments to journalists on behalf of the Foundation without prior approval
- Have full responsibility for maintaining electronic and hard copies of beneficiary data and files. Information that may be considered illegal, insulting or inappropriate should not be



transformed, transferred or disseminated, uploaded, or downloaded, on any of the Foundation's hardware

- Will not make statements to the press or other media or outlets and will not submit articles, books or other material for publication, including blogs, social media or other electronic for a, if such publication is related with the interests and activities of the Foundation without prior written approval
- Commit to non-disclosure of any confidential information that they may receive at any time during or after their cooperation with the Foundation. Violation of professional non-disclosure while working with the Foundation may lead to the termination, cause for damages or prosecution
- Will refrain from taking photographs of beneficiaries unless they have their explicit consent and invitation. Photographing children without parental consent is unlawful. Will refrain from posting photos where beneficiaries can be identified online or on social media feeds.

13. Fundraising

Any fundraising activity follows national, EU and international legislation and regulations. The Foundation is liable towards its donors and is bound to protect their rights with credible information on its funded activities. The fundraising procedures for development and implementation of interventions, reports and other documents relevant to the interventions are true, clear and transparent.

14. Fraud-Bribery

Any action or omission, including wrongful report or concealment of information or event that intentionally or unintentionally misleads a party is considered fraud. Fraud may take the form of withholding of monies or other assets or wrongful declaration.



Any offer, provision, acceptance of any moneys or other gift aiming to affect decision or judgement or actions of other parties is considered bribery. It may take the form of non-disclosed conflict of interest, or non-consensual acceptance of honorary distinction, of gifts or remunerations, illegal funds or financial blackmail.

Fraudulent acts may take the form of one of the following:

- Distortion of information or documents, false declarations on financial reports, distortion of procurement procedures
- Request for or acceptance of monies for the provision of information to a vendor for the sourcing of goods or services
- Distortion of invoices or creation of fake invoices
- Request for or acceptance of personal remuneration or other private benefit in exchange for favorable treatment
- Wrongful access to financial or other electronic systems of the Foundation

I will bring to the attention of the relevant manager any potential incident, abuse, or concern that I witness, I become aware of, or suspect which appears to breach the standards contained in this Code of Conduct.

If I have a complaint or concern relating to breach of the Code of Conduct I will report it immediately to my line manager and the Safeguarding Lead. If I do not feel comfortable reporting to either one of these two post holders, I may report to any other appropriate staff member. Staff members receiving reports or concerns will report immediately as per the Foundation's Safeguarding and Complaints procedures. Victims/ survivors and subjects of concern of allegations must participate in any investigation that may ensue the making of a complaint.



The Safeguarding Lead will evaluate the complaint. Any initial response will be made within twenty-four hours. Following the gathering of facts, a strategy meeting will be concerned to consider next steps. Depending on the nature of the allegation a response will be made within ten working days.

Should the complainant wish it, complaints may be anonymised.

I am responsible for becoming aware of updated versions of this document that are available on the Foundation's online communication and data management environments.

I have read and I understand the Vela Foundation's Code of Conduct and its standards. I agree to abide by the rules described above and understand that I have a responsibility to adhere to the rules and procedures.

Failure to do so or failure to satisfactorily perform my work or volunteer assignment may cause me to be subject to dismissal, disciplinary measures, or termination of my relationship with the Foundation, and where an act of criminality is concerned, a referral to the appropriate legal authorities will be made.

Employee's/ Volunteer's Full Name	Signature	Date
Witnessed and approved by:		
Name	Signature	Date



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