



FoRB Leadership Network Code of Conduct

Updated: 4 November 2019

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1. Fraud, bribery and corruption

FORBLN has a zero-tolerance approach to dealing with identified cases of fraud, bribery and corruption and will pursue company sanctions as well as legal charges if such instances are detected.

- “Fraud” means acting to mislead in order to gain financial benefit.
- “Bribery” is the offering, promising, giving, receiving or soliciting anything of value to improperly influence the actions of another party.
- “Corruption” is the abuse of entrusted power for private gain.

You must:

- Speak up and report any instances of fraud, bribery and corruption in line with the Whistleblowing Policy;
- Attend relevant face-to-face training and complete online modules related to counter-fraud and anti-bribery and corruption;
- Ensure that any grants or any other disbursement of client funds are safeguarded from fraud and bribery risks;
- Do not offer or accept kickbacks in any circumstances; and
- Do not give facilitation payments (e.g. paying a customs official a “fast-track fee” to clear goods through customs).

[Counter Fraud Policy](#)

[Anti-Bribery & Corruption Policy](#)

[Whistleblowing Policy](#)

2. Gifts and hospitality

You must not offer or accept any money, gifts or hospitality that could, or could seem to, influence your professional relationship with a client, beneficiary or any other third party. If you do, you could be charged with gross misconduct. If you offer or accept any gifts or hospitality, you must get approval in advance and disclose it in line with the Gifts & Hospitality Policy – failure to disclose may be considered a disciplinary offence. Always ask yourself if the gift or hospitality could be seen as a bribe.

Before offering or accepting any gift or hospitality you should make sure it is in line with the thresholds in the Gifts & Hospitality Policy, customary in a normal business relationship, and is unlikely to influence the other party’s or your own decision-making.

Be extra-cautious when the gifts or hospitality involve governments or public officials.

[Gifts and Hospitality Policy](#)

[Anti-Bribery & Corruption Policy](#)

3. Conflict of Interest

- FORBLN's advice must always be objective and independent. You must report any personal or business relationships that could, or could be perceived to, interfere with your objectivity.
- Avoid actual or perceived conflicts of interest
- Declare all conflicts of interest while you work for FORBLN to your Line Manager or Programme Manager, as appropriate

[Conflict of interest policy](#)

4. Equality, diversity, dignity and human rights

Our workplace provides an environment of respect for dignity and free from objectionable conduct. This specifically excludes all forms of harassment, which is a disciplinary offence and will normally be treated as gross misconduct. We respect the equality of all those with protected characteristics, including gender, age, race, religion, sexual orientation, marriage status and pregnancy/maternity. Concerns that these principles are not being respected can be pursued through the Grievance Policy.

We must also ensure that any suppliers that provide goods or services to FORBLN and any other third parties we work with share our commitment to complying with labour laws and human rights.

Always show respect for colleagues and the communities we work in. Speak up and raise any instances of harassment or discrimination

[Grievance Policy](#)

[Equality, Diversity and Dignity at Work Policy](#)

5. Human trafficking and modern slavery

Beyond basic compliance, FORBLN is committed to working with donors and partners to apply best practice through our supply chains and to use our own expertise to help end human trafficking, modern slavery (sex trafficking and compelled labour) and all human rights abuses.

If you witness any human rights abuse in our operations, you must report it to your line manager or through the Whistleblowing Hotline.

[Human Trafficking and Modern Slavery Policy](#)

6. Safeguarding

FORBLN has a safeguarding commitment to prevent and reduce harm to everyone who may be in contact with our staff and consultants. We have a specific Safeguarding Policy in place, as well as a Child Protection policy, which everyone at FORBLN must adhere to. The Safeguarding Lead is the Compliance Manager (Pieter.Francois@anthro.ox.ac.uk), creating a trusted point of contact for staff, consultants and anyone outside FORBLN, to raise concerns and ensure that any safeguarding matters are investigated and dealt with properly.

You must not:

- Engage in any form of sexual abuse or exploitation of any persons of any age;
- Have sexual relations with children (defined as under 18 years old) or with beneficiaries (in exchange for assistance or payment or any other reason) recognising the inherent unequal power dynamics involved; or
- Exchange money, offers of employment, goods or services for sex or sexual favours, nor any other forms of humiliating, degrading or exploitative behaviour within the course of your engagement with FORBLN.

If you witness any safeguarding breaches in our operations, you must report them to the Safeguarding Lead or through the Whistleblowing Hotline

[Safeguarding Policy](#)
[Child Protection Policy](#)

7. Data protection and use of IT resources

We must protect the sensitive information we hold and obtain authorisation to process or disclose it. FORBLN is subject to strict data rules to protect privacy including the General Data Protection Regulation (GDPR) - that all entities collecting data in the European Union must comply with.

We are responsible for using IT resources in an appropriate and professional manner at all times. Always exercise the highest standards when dealing with personal data Report any data breaches immediately to IT. Never use our IT systems to engage in illegal or inappropriate behaviour.

[Data Protection Policy](#)
[IT Acceptable Use Policy](#)

8. Environment

FORBLN is committed to minimising our environmental footprint by preventing pollution and encouraging practices to promote sustainability.

Only buy supplies when necessary and minimise the amount of materials i.e. stationery, office equipment, furniture consumed. Buy products, when available, that are made from recycled material and/or are recyclable and have minimal packaging.

[Environmental Policy](#)

9. Accounting and Reporting

The accuracy of the financial statements and reputation of FORBLN depend on all time and expenses being recorded according to our rules; and information on activities and performance being recorded in a timely and transparent way without misrepresentation or falsification.

FORBLN seeks to comply with the International Aid Transparency Initiative (IATI) and has a framework in place to publish relevant financial information to IATI.

You must:

- Ensure you keep accurate financial records;

- Ensure timely and accurate submission of invoices/timesheets;
- Support all expense submissions with receipts; and
- Not alter, delete or falsify financial records.

[International Aid Transparency Initiative](#)

10. How do I raise a concern?

FORBLN promotes a culture of openness, accountability, and high ethical standards. As part of your duty under the Code of Conduct, you must report suspected or actual violations of our policies, such as fraud, bribery, corruption and human trafficking, modern slavery and safeguarding.

You can report your concerns to your line manager, the Project Director or the Compliance Manager. Or you – and other staff, consultants, suppliers, clients or other stakeholders – can report anonymously through the FORBLN Whistleblowing Hotline. All reports are investigated, as appropriate, and handled confidentially.

The Whistleblowing Hotline can be used to report suspected misconduct, possible breaches of FoRBLN policies and procedures, and suspected violations of laws and regulations, including fraud, bribery and corruption, safeguarding, conflicts of interest, financial malpractice and significant environmental and health and safety concerns.

[Whistleblowing Policy](#)

11. Non-Retaliation

Retaliation against any colleague who in good faith seeks advice, raises a concern or reports misconduct is strictly prohibited. The fact that an individual has raised a concern in good faith, or has provided information in an investigation, cannot be a basis for denial of benefits, termination, demotion, suspension, threats, harassment or discrimination. If any individual, regardless of their role in FoRBLN, retaliates against a colleague who has truthfully and in good faith reported a potential violation, FoRBLN will take appropriate action - even if it later turns out that the colleague was mistaken in reporting the matter originally. However, if an individual has intentionally made a false report, FORBLN will take appropriate action.

Annex A: FoRB Leadership Network Ethics & Compliance Declaration

FRAUD, ANTI-BRIBERY AND CORRUPTION

I confirm that I have: (i) read, understood and accept responsibility for complying with the FoRB Leadership Network (FoRBLN) Counter Fraud and Anti-Bribery and Corruption Policy; (ii) understand the requirements and restrictions imposed by any applicable anti-corruption laws and regulations; and, (iii) confirm I shall not violate or cause FoRBLN or any of its representatives to violate the FoRBLN Counter Fraud and Anti-Bribery and Corruption Policy or any anti-corruption laws worldwide.

I confirm that should I witness, learn or become aware of any activities in connection with FoRBLN, which may constitute a violation of anti-corruption laws or a breach of the FoRBLN Counter Fraud and Anti-Bribery and Corruption Policy, I will immediately report to the responsible person in line with the policy or to FoRBLN's independent whistleblowing hotline provided by Protect.

CONFLICTS OF INTEREST

I confirm that I have declared all potential conflicts of interest in line with the FoRBLN Conflicts of Interest Policy and in the form below.

ANTI-TERRORISM

I confirm that I am not engaged in terrorism and hereby declare that I shall not engage or cause FoRBLN or any of its representatives to engage in terrorism or terrorism financing and will comply with the UK Terrorism Act 2000.

I am not subject to any sanctions under any US, UN, UK or EU anti-terrorism legislation.

TAX COMPLIANCE

I confirm that I am responsible for my own tax compliance in both the country in which I am domiciled and any country/ies in which I reside when providing services for FoRBLN and I

understand and will comply with the Criminal Finances Act 2017.

MODERN SLAVERY AND HUMAN TRAFFICKING

FoRBLN works with its partners and donors to ensure the potential for human trafficking and slavery is reduced as far as possible. I confirm that I will report any incident that may involve exploitation of any workers within FoRBLN's supply chain in accordance with FoRBLN's Modern Slavery & Human Trafficking Policy or to FoRBLN's independent whistleblowing hotline provided by Protect.

SAFEGUARDING

I confirm that I have read, understood and accept responsibility for complying with FoRBLN's Safeguarding Policy.

I confirm that I shall not engage in (i) sexual activity with any person under the age of 18, regardless of the local age of consent, and shall not engage in (ii) transactional sex which shall include but not be limited to the exchange of money, employment, goods or services for sex. This confirmation to not engage in such conduct applies whether or not the conduct would amount to a criminal offence in the United Kingdom or an offence under the laws of the territory in which it takes place.

ETHICAL BEHAVIOUR

I acknowledge that all employees, advisers/associates and representatives of FoRBLN must demonstrate the highest standards of ethical behaviour and must not bring FoRBLN into disrepute through their professional or personal conduct.

I accept that I have a responsibility to understand, comply with and promote FoRBLN's Code of Conduct available at: www.forbln.org/codeofconduct.

SIGNATURE:

NAME (in block capitals):

ORGANISATION (if applicable):

DATE:

DECLARATION OF INTEREST FORM

This form should describe the nature of applicable outside interests and to the extent applicable how it creates (or could create) a conflict of interest, or even the perception of a conflict of interest.

Category	Please give details of the interest and whether it applies to yourself or, where appropriate, a member of your immediate family, connected persons or some other close personal connection		
Current employment and any previous employment in which you continue to have a financial interest			
Appointments (voluntary or otherwise) e.g. trusteeships, directorships, local authority membership, tribunals etc.			
Membership of any professional bodies			
Investments in unlisted companies, partnerships and other forms of business, major shareholdings			
Any other conflicts that are not covered by the above			
Please list any other assignments that you will be working on whilst contracted with FORBLN	Name of assignment	Organisation	Dates

I hereby certify that the information above is true and complete to the best of my knowledge. In the event of any material change or new interests, I will update the form as appropriate and notify the responsible FORBLN member of staff.

NAME:

SIGNATURE:

FOR COMPLETION BY THE RESPONSIBLE PERSON

I have reviewed the Conflicts of Interest recorded above. The following mitigating actions have been agreed in writing with The Registrant as follows:

TITLE:

SIGNATURE:

DATE:

WHISTLEBLOWING AND REPORTING OBLIGATIONS

FORBLN Whistleblowing Hotline

It is your responsibility to uphold the principles of the FORBLN Whistleblowing Policy and to report breaches of FORBLN policies and procedures through one of the following channels:

- Your line manager
- Project Director
- Principal Investigator
- Compliance Manager (Pieter.Francois@anthro.ox.ac.uk)

Alternatively, any concerns can be reported through our external partner, Protect, via:

- **Online reporting at** <https://protect-advice.org.uk/contact-protect-advice-line/>
- **By calling** +44 20 3117 2520 from anywhere in the world.

Reports to Protect are confidential, secure and you may elect to remain anonymous even if you accidentally mention your name on the telephone. Calls to Protect are not recorded. Protect also offers multi-lingual support.

DFID Counter Fraud and Whistleblowing Unit

You need to be aware of the DFID Whistleblowing Hotline as an available channel for reporting suspicions or allegations of aid diversion, fraud, money laundering, sexual exploitation and abuse, or terrorism financing:

Email: reportingconcerns@dfid.gov.uk

Phone: +44 1355 843551