

Anglican Board of Mission – Australia

Policy A1008

ABM Code of Conduct

Accepted by the ABM Board December, 2019

To be reviewed no later than 2022

Contents

- 1 Introduction
- 2 ABM’s Vision, Mission and Values
- 3 Scope
- 4 Values and Behaviour
- 5 Child Protection
- 6 Sexual Exploitation, Abuse and Harassment (SEAH)
- 7 Bullying and Harassment
- 8 Ethical Business Practices and Preventing Fraud and Corruption
- 9 Disclosure
- 10 Confidentiality
- 11 Specific Code of Conduct-Related Policies and Procedures
- 12 Reporting and Disciplinary Procedures

1 Introduction

Anglican Board of Mission (ABM) promotes the highest standards of behaviour and accountability in our relations with our partners, supporters, other members of the Anglican Alliance, the Action by Churches Together (ACT) Alliance and the people with whom we work in all our programs.

These standards are consistent with our values. ABM shares this commitment with other members of the ACT Alliance and with the Australian Council for International Development (ACFID) as a signatory to their Codes of Conduct. This Code also reflects the principles and requirements of the Department of Foreign Affairs and Trade (DFAT) Child Protection Policy, Preventing Sexual Exploitation, Abuse and Harassment Policy, and their Social and Environmental Safeguards Policy.

This Code reflects and gives effect to a number of ABM policies, which are listed at the end of this document.

ABM is committed to reviewing this Code of Conduct, and to conducting re-orientation sessions with its Personnel, at least every three years.

ABM will also share this Code of Conduct with its partners on an annual basis.

2 ABM’s Vision, Mission and Values

ABM's mission is to help the Anglican Church and the wider community realise and respond to the call for each of us to be part of God's hope for the world.

ABM's vision is that it wants to see people everywhere experience the wholeness of life God offers in Jesus Christ and to this end support our partners as they participate in God's mission.

ABM has identified the following values as guiding all aspects of its work:

- i. Faithfulness to God;
- ii. Integrity in all aspects of our work;
- iii. Respect for the created order and human dignity;
- iv. Wise Management of our resources;
- v. Creativity and hard work; and
- vi. Relational reciprocity.

3 Scope

The Code of Conduct applies at all times including outside normal working hours to all individuals when they are representing ABM.

These individuals will be referred to collectively as 'ABM Personnel' throughout this document.

ABM Personnel¹ include:

- i. ABM staff;
- ii. Board members;
- iii. ABM volunteers, including individuals and groups who visit overseas partners or projects funded by ABM;
- iv. ABM Contractors (including advisors and consultants);

4 Values and Behaviour

ABM Personnel shall at all times:

- a. Act in ways consistent with the Christian principles underpinning the work and service of ABM;
- b. Ensure their personal and professional behaviour is, and is seen to be, of the highest standard and in keeping with ABM's Vision, Mission and Values, and does not bring ABM into disrepute.
- c. Respect and promote fundamental human rights without discrimination irrespective of race, ethnicity, indigeneity, colour, disability, displacement, caste, religion, gender, gender identity, sexual orientation, age, marital status, poverty, national origin, political affiliation or socio-economic status;
- d. Contribute to a work environment that is fair, equitable and free of harassment and bullying, and act with honesty and good faith, treating all other ABM Personnel with respect and dignity;
- e. Help to build a harmonious workplace based on team spirit, mutual respect and understanding;
- f. Treat all communities with whom we work (including indigenous people, crisis-affected populations, Internally Displaced Persons and refugees), fairly and with respect, courtesy, dignity and according to International Laws and Standards;

¹ ABM's Casual Helpers may choose to sign this Code of Conduct, or, alternatively, their diocesan 'Faithfulness in Service' document.

- g. Uphold the highest standards of accountability, efficiency, competence, integrity and transparency in decision-making, especially as such decisions involve and impact upon ABM's partners and other stakeholders;
- h. Act in accordance with health, safety and security guidelines and endeavour to safeguard others;
- i. Be familiar with their rights and responsibilities as articulated in this Code of Conduct and other relevant ABM Policies and Procedures;
- j. Contribute to, and take ownership of, decisions that support the achievement of the mission and vision of ABM;
- k. Respect the role and decisions of ABM's Board and management;
- l. Promote a team environment by acknowledging the work of others and, as appropriate, providing constructive feedback on their contribution to the work of ABM;
- m. Respect other staff, partners and stakeholders by maintaining an appropriate level of confidentiality while working for ABM;
- n. Be aware of ABM's Whistleblower Policy, and particularly the requirement for bystanders to report any perceived or actual breaches of this Code of Conduct, the ACFID Code of Conduct, or any of ABM's policies, or any illegal activity, via ABM's Complaints Procedure.
- o. Comply with relevant laws of the country in which they are working;
- p. Understand and adhere to ABM's Travel Procedures and relevant Workplace Health and Safety policies, and be familiar with the corresponding policies of ABM's partners;

ABM Personnel must **not**:

- a. Misuse alcohol or other drugs which may adversely affect their work or service, the safety of colleagues or the reputation of ABM;
- b. Drive a vehicle while on duty while under the influence of alcohol or any illegal substance;
- c. Use the position of power conferred by their role to exert pressure, gain economically, professionally or sexually, or extract or accept favours, bribes, gifts or other forms of personal enrichment.

5 Child Protection

ABM Personnel **must**:

- a. Understand that child abuse by staff constitutes an act of gross misconduct and are therefore is grounds for termination of employment and may lead to criminal prosecution;
- b. Treat children with respect regardless of race, ethnicity, indigeneity, colour, disability, displacement, caste, religion, gender, gender identity, sexual orientation, age, marital status, poverty, national origin, political affiliation or socio-economic status;
- c. Wherever possible, ensure that another adult is present when working in the proximity of children and allow the child to select their chaperone (parent, teacher, agency staff etc);
- d. Ensure contact with children, young people, vulnerable adults (whether by phone, online or via direct contact) is supervised, accompanied, or is at least in sight and hearing or with knowledge (in case of online communication) of other adults;
- e. Refrain from physical contact with all children they encounter in the course of their work with ABM, unless it is to avert danger to the child;
- f. Wherever possible, respect a child's right to privacy;
- g. Comply with all relevant Australian and local legislation, including labour laws in relation to child labour;

- h. Immediately report concerns or allegations of child exploitation and abuse and policy noncompliance in accordance with ABM's Child Protection Procedures. Report matters of a criminal nature to local authorities;
- i. Immediately disclose all charges, convictions and other outcomes of an offence, which occurred before or occurs during their association with ABM that relate to child exploitation and abuse; and,
- j. Be familiar with and apply the letter and spirit of ABM's Child Protection Policy in all circumstances.

ABM Personnel must not:

- a. Use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate;
- b. Engage children in any form of sexual intercourse or sexual activity, including paying for, or exchanging goods or services for, sexual services or acts;
- c. Engage in any form of harassment, discrimination, physical or verbal abuse, intimidation, or favouritism of children;
- d. In the course of their work with ABM, use alcohol or other recreational drugs in the company of children;
- e. Supply alcohol or recreational drugs to children;
- f. In the course of their work with ABM, give gifts to children, unless with the full knowledge and permission of the child's parent or guardian;
- g. In the course of their work with ABM, invite unaccompanied children (who are not their own) into their place of residence, unless they are at immediate risk of injury or in physical danger;
- h. In the course of their work with ABM, sleep close to unsupervised children (who are not their own) unless absolutely necessary, in which case they must obtain the supervisor's permission, and ensure that another adult is present where possible;
- i. In the course of their work with ABM, engage in activities of an intimate nature with children (who are not their own), such as toileting or bathing;
- j. Use any computers, mobile phones, video cameras, cameras or social media inappropriately, and never exploit or harass children or access child exploitation material through any medium;
- k. Use physical punishment on children;
- l. give gifts to any children encountered in the course of their work with ABM
- m. Hire children for domestic or other labour which is inappropriate to their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury;

When photographing or filming a child for work related purposes, ABM Personnel must:

- n. Assess and comply with local traditions or restrictions for reproducing (see ABM Communications Manual);
- o. Obtain informed consent before photographing or filming anyone, but especially a child, where the consent of the child and a parent are required. As part of this, ABM Personnel must explain how the photograph or film will be used;
- p. Ensure photographs, films, videos and DVDs present people, especially children, in a manner that is dignified and respectful and not one that is vulnerable or submissive. Children should be adequately clothed and not presented in poses that could be seen as sexually suggestive;
- q. Ensure images are honest representations of the context and the facts;

- r. Not underestimate the reach of the internet. A picture of a child published on an Australian website can be viewed by someone in that child's community overseas, posing potential risks for the children our agency works for; and,
- s. Ensure there is no identifying information about a child in visual materials, whether in any form of published material, or in the labelling of files transmission (photos, videos, stories about children), or in their electronic transmission, including by turning off the geo-tagging functions on still and video cameras and mobile phones.

6 Sexual Exploitation, Abuse and Harassment (SEAH)

ABM Personnel **shall at all times**, both during and outside official working hours:

- a. Understand that sexual exploitation, abuse by staff constitute acts of gross misconduct and are therefore grounds for termination of employment;
- b. Take reasonable action to protect others from harm and to challenge infringements of the rights of others;
- c. Immediately disclose all charges, convictions and other outcomes of an offence, which occurred before or occurs during their association with ABM that relate to sexual exploitation, abuse or harassment;
- d. Immediately report concerns or allegations of SEAH and policy non-compliance in accordance with appropriate procedures. These are outlined in ABM's Prevention of Sexual Exploitation, Abuse and Harassment Policy. Immediately report any matters of a criminal nature to the local authorities, unless this is contrary to the wishes of the victim/survivor;
- e. Understand that the exchange of money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is totally unacceptable and is prohibited;
- f. Understand what constitutes sexual harassment;
- g. Be aware of, and abide by, the specific child-related provisions outlined in Section 5 of this Code.

ABM Personnel **must not**:

- a. Exchange money, employment goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. This includes the exchange of sexual favours for assistance that is due to communities we assist, or partners ABM works with.
- b. Fraternise with project beneficiaries.²
- c. Take advantage of a position of power to enter into a relationship with a colleague.
- d. Use their power to withhold assistance or services, or to give preferential treatment.
- e. Identify survivors of sexual exploitation, gender-based violence, or abuse as such.
- f. Abuse a position to withhold development assistance, or give preferential treatment, in order to solicit sexual favours, gifts, payments of any kind, or advantage;
- g. Engage in a sexual relationship with a member of a partner staff of ABM, or with a member of a community which is in receipt of ABM funds whether for emergency response or development activities;
- h. Reveal an individual's status as a person living with HIV, TB or any other serious health conditions without written consent.

² DFAT defines 'fraternisation' as 'any relationship that involves, or appears to involve, partiality, preferential treatment or improper use of rank or position including but not limited to voluntary sexual behaviour. It could include sexual behaviour not amounting to intercourse, a close and emotional relationship involving public displays of affection or private intimacy and the public expression of intimate relations.' (PSEAH Policy, April, 2019)

- i. Identify an individual's engagement in what may be culturally unacceptable activities (such as promotion of child rights or challenging gender norms);
- j. Engage in any form of sexual harassment, including but not limited to:
 - i. Engaging in sexually suggestive behaviour, such as leering or staring; brushing up against someone, touching, fondling or hugging;
 - ii. Making sexually suggestive comments or jokes;
 - iii. Displaying sexually suggestive screen savers, photos, calendars or objects;
 - iv. Making repeated unwanted requests to go out;
 - v. Making requests for sex;
 - vi. Making sexually explicit posts on social networking sites;
 - vii. Making insults or taunts of a sexual nature;
 - viii. Sending sexually explicit emails or text messages;
 - ix. Making inappropriate advances on social networking sites;
 - x. Accessing sexually explicit internet sites;
 - xi. Displaying behaviour that may also be considered an offence under criminal law, such as physical assault, indecent exposure, sexual assault, stalking or obscene communications.

ABM, in consultation with its implementing partners, promotes the integration of a gender-sensitive perspective into efforts to effectively prevent and respond to sexual abuse, exploitation and harassment.

7 Bullying and Harassment

Sexual harassment is covered under Section 6 of this Code of Conduct.

ABM does not tolerate any form of bullying or harassment, in the workplace or in any other operational context. This includes sexual, gender and racial harassment, bullying and discrimination (including any unwelcome comment or behaviour that is offensive, demeaning, humiliating or derogatory), or any other inappropriate behaviour that fails to respect the dignity of an individual. ABM Personnel should not commit any act or form of harassment as it results in physical, sexual or psychological harm or suffering to individuals, especially women and children.

Bullying is repeated, inappropriate, overt and covert behaviour that criticises, belittles, isolates and undermines the victim. It involves humiliation, sabotage, spreading gossip, overwork, unnecessary pressure, delaying tactics and can escalate into physical and verbal assault, sexual assault and arson.

Genuine issues about management prerogative and genuine disciplinary procedures should not be interpreted as bullying, as noted by the Australian Human Rights Commission.

ABM Personnel must:

- a. Treat everyone with dignity and respect in the workplace;
- b. Understand what constitutes harassment, recognise early signs of sexual, gender, racial or other targeted forms of harassment and take swift action to prevent and resolve this.
- c. Understand what constitutes bullying, empower staff affected by it, develop strategies to reduce and eliminate it, and take all necessary disciplinary action against those found to have committed bullying.

ABM Personnel must not:

- a. Commit any form of harassment;
- b. Engage in any form of bullying;
- c. Engage in any behaviour likely to make the recipient feel persecuted, vulnerable or powerless;
- d. Make repeated threats of dismissal or other severe punishment, that do not follow ABM's Counselling and Grievance procedures;
- e. Make/send offensive messages (e.g. via email, telephone or other means);
- f. Make unreasonable demands and set impossible targets;
- g. Set restrictive and petty work rules;
- h. Force another to work longer hours;
- i. Unfairly roster or allocate work;
- j. Implement constant, intrusive surveillance or monitoring of others;
- k. Fail to undertake adequate levels of consultation;
- l. Interfere with personal belongings;
- m. Sabotage others' work;
- n. Use abusive language;
- o. Make and open or implied threat of dismissal or demotion.
- p. Significantly impair another person's work in any way such as:
 - i. withholding information,
 - ii. removing content or alter the intent of another person's work;
 - iii. maliciously excluding and/or isolating another person from workplace activities that they would normally be involved in;
 - iv. making persistent and unjustified criticisms, about petty, irrelevant or insignificant matters;
 - v. humiliating another person through gestures, sarcasm, criticism and insults;
 - vi. spreading false information;
 - vii. asking intrusive questions or make statements about a person's private life;

8 Ethical Business Practices and Preventing Fraud and Corruption

ABM Personnel must:

- a. Promote a culture of honesty and openness among ABM staff and management;
- b. Be transparent in all work-related financial transactions;
- c. Ensure that financial and other resources are used solely for the intended purposes;
- d. Work to implement effective prevention strategies to minimise the risk of financial wrongdoing;
- e. Foster a work environment where communities and staff can safely and confidentially raise and report all serious concerns about suspected fraud and corruption;
- f. Conduct all business in accordance with internationally accepted practices and procedures and uphold the highest standards of accountability and transparency in relations to finances, management and governance, where relevant.
- g. Follow transparent, accountable and honest practices when receiving cash donations from the public earmarked for humanitarian or development purposes;
- h. Declare any known or potential conflicts of interest to their employer (as outlined in ABM's Conflict of Interest Policy);
- i. Pay compulsory government taxes and comply with national business law and international standards;

- j. Comply with relevant national workplace health, safety and environmental standards in all aspects of ABM's work both in Australia and overseas;
- k. Ensure, where possible, that goods purchased are produced and delivered under conditions that do not involve the abuse or exploitation of any persons and have the least negative impact on the environment;
- l. Check all ABM Personnel and the personnel of partners with whom ABM enters into contractual arrangements against approved lists of terrorist organisations and individuals and report any matches to relevant authorities;
- m. Promptly report any financial wrong-doing, either to their supervisor or via whistleblowing mechanisms (see ABM's Whistleblower Policy);

ABM Personnel must not:

- a. Commit any financial wrongdoing, including theft, misuse or misappropriation of funds or property, false accounting, forgery or unauthorised alteration of documents, avoiding creating an unauthorised liability or wrongfully using information or intellectual property;
- b. Engage in document or cheque forgery, money laundering, taking of commissions or influencing tender processes for improper benefit and theft;
- c. Knowingly support individuals or entities involved in illegal or terrorist activities;
- d. Deliberately destroy, falsify, alter or conceal evidence material to an investigation or make false statements to investigators in order to materially influence or impede investigations into corrupt, fraudulent, coercive or collusive allegations;
- e. Accept a bribe in the form of money, goods or services to secure a contract for services when dealing with suppliers in any development or humanitarian work;
- f. Accept any gifts or other favours that may influence the performance of their functions or duties. Gifts are defined as, but not limited to: services, travel, entertainment and material goods. In order to respect national and local traditions and conventional hospitality, minor token gifts such as pens, calendars, desk diaries, etc. can be accepted. These are articulated in ABM's Declaration of Gifts Policy;
- g. Take part in activities that generate personal, organisational or collective profit such as buying or selling when such activities may affect, or appear to affect, ABM's credibility or integrity, or that of its partners;
- h. Share in the profits or surpluses as kickbacks, cuts or discounts for personal or organisational benefits;
- i. Launder money, take commissions, or influence tender processes for improper benefit or theft;
- j. Make improper use of:
 - i. ABM resources;
 - ii. inside information; or
 - iii. their status, power or authority as ABM Personnel in order to gain a benefit;
- k. Use illegal labour, child labour or forced labour in any work area;
- l. Use or distribute products or supplies that are known to be unsafe in any development or humanitarian setting.

9 Disclosure

ABM Personnel must disclose any convictions for criminal offences which occur during their employment with ABM.

10 Confidentiality

Written and spoken information will be protected from being shared with unauthorised persons or used for a purpose other than that for which it was collected. ABM is guided in this by its Privacy Policy.

11 Specific Code of Conduct-Related Policies and Procedures

| Specific Aspect | Detailed Policy and/or Procedure |
|---|---|
| <p>Values and Behaviour To ensure all ABM Personnel maintain a high standard of personal and professional conduct at all times, and act in ways that reflect the vision, mission and values of ABM.</p> | <p>Vision, Mission and Values of ABM A1032 Gender Policy A1004 Privacy Policy</p> |
| <p>Child Protection To protect children from exploitation and abuse of all kinds in the delivery of ABM’s programs and activities.</p> | <p>A1011 Child Protection Policy B2013 Child Protection Procedure</p> |
| <p>Photography and Video Standards To ensure ABM portrays all people with respect, dignity, truthfulness, and with a view to causing no harm to those it portrays.</p> | <p>ABM Communications Manual A1011 Child Protection Policy B2013 Child Protection Procedure</p> |
| <p>Prevention of Sexual Exploitation, Abuse and Harassment To prevent ABM Personnel from sexually exploiting, abusing or harassing others, and to protect ABM Personnel, partners, and the communities with whom ABM works from sexual exploitation, abuse and harassment.</p> | <p>A1009 Prevention of Sexual Exploitation, Abuse and Harassment Policy</p> |
| <p>Ethical Business Practices and Prevention of Fraud and Corruption ABM has a zero-tolerance policy to all instances of fraud within the organisation and among ABM’s partner organisations with whom it has funding arrangements.</p> | <p>A1001 Fraud and Corruption Policy B2018 Financial Procedures Manual</p> |
| <p>Inappropriate workplace behaviour Includes discrimination through harassment, victimisation, vilification or bullying.</p> | <p>B2001 Workplace Guidelines</p> |
| <p>Conflict of Interest Conflicts of interests arise where a secondary interest improperly influences a workplace participant’s decisions, performance or behaviour</p> | <p>A1005 Conflict of Interest Policy A1007 Declaration of Gifts Policy B2001 Workplace Guidelines</p> |
| <p>Reporting and Complaints Handling ABM is committed to documented feedback and complaints handling policies and procedures that take into account the needs, expectations and</p> | <p>A1010 Complaints Policy A2002 Whistleblower Policy B2003 Internal Complaint Procedure B2004 External Complaint Procedure</p> |

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|---|---|
| <p>rights of complainants and provide the mechanisms for complaints to be addressed confidentially in an efficient, fair and timely manner.</p> <p>Complaints mechanisms have a triaging component allowing serious complaints to be dealt with in a timely and appropriate manner.</p> | |
| <p>Staff Safety ABM places the security and safety of all its representatives, and those with whom we work, as a top priority.</p> | <p>B2025 Travel Procedure B2005 Work Life Balance Procedure B2001 ABM Workplace Guidelines B2026 Office Security Procedures</p> |

ABM's Executive Director may add to the above list of policies and procedures from time to time, and must notify ABM Personnel of any changes to this Code of Conduct.

12 Reporting and Disciplinary Procedures

Violation of this Code of Conduct will not be tolerated and may, in accordance with relevant legislation and the various ABM policies and procedures, lead to internal disciplinary action, dismissal or criminal prosecution.

ABM will respond to allegations of misconduct it receives regarding ABM Personnel in line with its policies and related disciplinary procedures. ABM has established procedures for promptly investigating, recording and dealing with misconduct.

Those who wish to lodge a complaint about an alleged breach of this Code by ABM Personnel should lodge their complaint to the ABM Complaints Officer in accordance with ABM's Complaints Policy, Grievance Procedure or Whistleblower Policy.

ABM Complaints Officer Contact Details

Email: complaintsofficer@abmission.org.au or, for a Safeguarding matter safeguarding@abmission.org.au

Telephone +612 9264 1021 and ask for the Complaints Officer (or Safeguarding Focal Point)

Fax: +61 2 9261 3560

| Policy History | |
|--------------------------|----------------|
| Name of Policy | Date Adopted |
| Code of Personal Conduct | March, 2016 |
| ABM Code of Conduct | December, 2019 |