

# CODE OF CONDUCT

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## Introduction

Anti-Slavery International's work is based on deeply held values and principles. Anti-Slavery International relies on its reputation for integrity, and in some circumstances a considerable amount of trust, in building relationships with local communities and partners, members, donors, policy makers and all other stakeholders. Anti-Slavery International also takes pride in the pursuit of high ethical standards for their own sake, in accordance with its organisational values.

Anti-Slavery International maintains a strictly zero-tolerance policy towards bullying, harassment, sexual exploitation or abuse, of any form, perpetrated by any representative of the organisation.

The purpose of this Code of Conduct is:

- To ensure high standards of staff behaviour and integrity
- To safeguard the welfare of Anti-Slavery International staff, interns and volunteers, and of external stakeholders with whom Anti-Slavery International works or comes into contact
- To protect Anti-Slavery International's reputation and interests

In accepting appointment, you undertake to discharge your duties and to regulate your conduct in line with the requirements of this code. This code of conduct should be used in conjunction with other organisational policies, which you are also encouraged to familiarise yourself with. If in doubt about any provisions of this code, please consult your manager, a member of the Senior Management Team (SMT), or the chair of the board.

## Organisational values

Anti-Slavery International's organisational values are:

### Transformative

We work at all levels for long-term, sustainable, systemic change, challenging power structures, persisting until our aims have been achieved.

### Authoritative

We are a knowledgeable and reliable organisation whose positions are developed through sustained human rights-based work with affected peoples and communities, and through rigorous, evidence-based research.

### Ethical

We are an independent organisation whose decisions, actions and positions are drawn from a human rights-based approach to driving targeted social change, are consistently applied and are not shaped by vested interests such as governments or corporations.

### Equitable

We are committed to fairness, non-discrimination and mutual respect, both internally and externally, in all of our decisions and actions, and the impartial fulfilment of each person's human rights and dignity, including where this may involve taking affirmative action in favour of disadvantaged individuals and groups.

### Accountable

We are responsible to a range of groups and individuals, both internally and externally, for the integrity of our actions and decisions, demonstrated through a proactive culture of openness and transparency.

### Collaborative

We are strengthened by working together, through respectful, participatory collaboration and consultation, proactively identifying and involving marginalised and vulnerable groups.

Staff should be informed of, and familiarise themselves with, these values as part of the staff induction. These values will also be reflected in the appraisal process.

During working hours, while at Anti-Slavery International offices, and when representing Anti-Slavery International externally (including while on mission), staff should bear these values in mind and take proactive steps to embody and uphold these values.

## Scope

The code of conduct covers

- All full-time, part-time and volunteer workers with Anti-Slavery International;
- Consultants and temporary staff
- Volunteers and trustees (trustees should also refer to the **Trustees Code of Conduct**)
- Anyone else formally representing Anti-Slavery International

all of whom will in this document be hereafter referred to by the term 'employees' or 'staff'.

- All locations where Anti-Slavery International works are covered by the code.
- In circumstances where the conditions of engagement for locally employed Anti-Slavery International staff (such as long term Anti-Slavery International consultants) conflict with this code, such circumstances must be discussed with a member of SMT or the CEO.
- The conduct of partner staff will be governed separately through Anti-Slavery International's grant and partnership agreements with the partner: Anti-Slavery International will work with partners to develop their own codes of conduct (funding capacity permitting) which reflect the core elements of this code to the greatest extent possible.

## Implementation

Each member of staff and each trustee is required to sign a Statement of Commitment to comply with the code, which forms part of all employees' contractual obligations. This Statement of Commitment can be found in Appendix A. Consultants, temporary staff, volunteers, or those representing Anti-Slavery International in any other capacity should also be presented with a copy of the Code by their point of contact at Anti-Slavery International (usually the staff member who is managing their recruitment or commissioning), and will also be required to sign an acknowledgement of intent to comply with it.

The Head of Finance and Resources is ultimately responsible for administering the provisions of the code and acting to resolve issues under the code.

Anti-Slavery staff should act in accordance with Anti-Slavery International's policies and UK law at all times but, in addition, when working outside of the UK, staff should (to the greatest extent reasonably possible) refrain from any activities which breach the law of the country they are visiting.

This is in order to respect local customs, and to avoid being criminally prosecuted or damaging Anti-Slavery International's reputation. In circumstances where local laws are stricter than UK law, this may mean staff are obliged temporarily to forego rights they are accustomed to in order to comply with local law. Exceptions to the obligation to comply with local law will be made in circumstances where doing so would directly undermine the delivery of Anti-Slavery International's work; staff must ensure that a member of SMT has approved the instance of non-compliance with local law in writing or, where this is not possible, must inform a member of SMT as soon as the infraction occurs.

Enforcement of the code is defined in a dedicated section below, with more detailed provisions on potential enforcement measures in the **Disciplinary Procedure**.

All staff have a responsibility to encourage and uphold good practice, with SMT, line managers and Union members taking a lead in encouraging interdepartmental dialogue, championing high standards, and developing a culture that takes misconduct seriously.

## Working environment

Anti-Slavery International believes that staff members perform best in a work place that is fair and respectful, and is committed to an environment which:

- Ensures that staff recruitment, selection, recognition, and career development processes are fair and transparent
- Encourages and supports staff to fulfil their potential
- Promotes collaboration across the organisation discouraging divisions between working teams
- Recognises and rewards staff for their contributions and potential
- Provides fair access to opportunities for career growth and advancement
- Promotes diversity at all levels of the organisation

Staff are also referred to the **Dignity at Work policy**, with which they are advised to familiarise themselves.

## Involvement with communities and other external stakeholders

Anti-Slavery International staff may occasionally engage with local communities as part of their work with implementing partners or as part of other activities such as project scoping or research.

- In their capacity as representatives of Anti-Slavery International, staff should in nearly all circumstances avoid involvement in national or local political movements, or leadership in community activities that might compromise Anti-Slavery International's objectives (for example, undermining Anti-Slavery International's ability to take an apolitical position by associating Anti-Slavery International with a specific political group) in the country or region. In cases where such activities do align with Anti-Slavery International's objectives (for example, if Anti-Slavery International were implementing a project that explicitly supports a particular movement or political campaign), they must only be undertaken with written permission from the SMT or CEO. This does not apply to the personal activities of staff outside work, although even in their capacity as private individuals (as opposed to representatives of Anti-Slavery International) they should also avoid associating Anti-Slavery International with the groups or activities specified above.
- Anti-Slavery International staff should always be conscious of how their behaviour may cause harm to others (see the **Safeguarding Policies**) or may affect Anti-Slavery

International's reputation with stakeholders such as donors, partners and members, as well as among local communities and beneficiaries.

- Except where it directly contradicts the objectives of Anti-Slavery International, all effort should be taken to avoid offending local communities' sensitivities. In any cases of doubt and where not clear from this policy, as to what constitutes appropriate behaviour, staff members should in the first instance consult their line manager.

## Behaviour outside of work

Normally, Anti-Slavery International has no jurisdiction over employee activity outside of working hours. Behaviour outside working hours will only become an issue if the activities do, or have the potential to, adversely affect Anti-Slavery International or if a staff member is acting as a representative of Anti-Slavery International. When a staff member is on mission or away from the office for any work-related activity, they are considered to be a representative of Anti-Slavery International at all times.

Adverse publicity, bringing Anti-Slavery International's name into dispute, actions that are in contradiction with ASI values, result in loss of faith in Anti-Slavery International, or loss of faith in the integrity of the individual as a representative of Anti-Slavery International, will result in disciplinary procedures being instigated.

## Relationship to culture, religion and traditions

Anti-Slavery International expects staff not to behave negatively towards another person because of their religious, political or cultural beliefs, such as other staff, partners or third parties. Such behaviour will not be tolerated and may result in disciplinary procedures being instigated.

Considerable care should be exercised in religious activities. Although Anti-Slavery International will not restrict religious practice of any kind, staff and dependents need to be aware of local sensitivities towards particular religious practices and to take appropriate actions as representatives of Anti-Slavery.

## Work-life balance

Anti-Slavery International staff members are committed to delivering results in an accountable and professional manner. To this end and recognising the importance and benefits of an appropriate work-life balance in terms of job satisfaction, motivation, workplace productivity and overall work environment, Anti-Slavery International acknowledges that issues may arise that can affect individual work-life balance or the health of staff, and will adopt a flexible approach and try to make adjustments to resolve such issues insofar as is reasonably possible.

Work-life balance is defined as the positive relationship between work and other equally important activities in life, such as family, leisure or other activities. The positive relationship varies from person to person according to their life and work-related demands. Work-life balance is not a practice that shall adversely affect career or professional development opportunities (see also the **Family Leave Policy**).

## Conflicts of interest

Occasionally, a conflict of interest may occur between Anti-Slavery International activities and personal activities. This can particularly occur in the areas of service provision and business contracts. Conflict of interest arises when an employee has a financial or personal interest, kinship or relationship, or engages in any activity (paid or unpaid) which could:

- Enable him/her to secure some personal advantage (other than salary) or advantage for a relative as a result of his/her being employed by Anti-Slavery International
- Influence his/her judgement in relation to the performance of his/her duties on behalf of Anti-Slavery International. This includes making decisions that are not in the interests of Anti-Slavery International
- Negatively impact his/her ability to contribute to the work of the organisation
- Inhibit free discussion
- Have a negative impact on the reputation of Anti-Slavery International
- Affect management or recruitment of consultants or staff

The above examples are not exhaustive.

An *actual* conflict of interest is when a staff member's personal interests or connections compromise their objectivity and professional judgement in their work at Anti-Slavery International. A *potential* or *perceived* conflict of interest arise when there is, or is perceived to be, a risk of this occurring in future.

In all cases, staff members have a duty to identify and declare any actual, potential or perceived conflict of interests and to follow steps to manage the conflict as outlined by their line manager.

Basic rules to prevent and manage conflicts of interest:

- Appropriate and proportionate management will be put in place for each instance of conflict of interest, often relying on the professional integrity of staff to be transparent, aware and manage situations
- Staff are not permitted to form contractual business relationships between members of their own extended family and Anti-Slavery International
- Staff who also manage private businesses or have a financial interest in businesses are not permitted to sign contracts between Anti-Slavery International and those businesses
- If a member of staff is connected with a contractor through an existing personal relationship (including family connection, friendship), then it may be necessary for another member of staff to be involved in their management as part of efforts to manage the conflict of interest
- Where an employee becomes aware of a potential conflict of interest they must immediately discuss this matter with their manager. Anti-Slavery International will make reasonable effort to ensure that staff will not be disadvantaged by the process of enhancing neutrality and fairness
- A conflict of interest must be declared, and once declared will need to be mitigated (though not necessarily removed) unless it is judged by a member of the SMT to be harmless. The SMT or CEO should be consulted in any cases of doubt
- Where an employee continues to permit a conflict of interest to remain, without suitable efforts to mitigate it, disciplinary processes may be invoked (see Anti-Slavery International's **Disciplinary Procedure** for details)

Please consult the section on Relationships with other staff on the issue of sexual relationships between supervisors/managers and staff.

## Discrimination and favouritism

Neither discriminatory practices nor favouritism will be tolerated at Anti-Slavery International.

Discriminatory practices include making inappropriate comments and permitting inappropriate language or behaviour in the workplace; and not granting fair terms and conditions, or making decisions on recruitment and contracting (such as whether to extend a contract), because of:

- Age
- Gender and gender identity
- Parental or carer status
- Disability
- Marital status
- Physical appearance
- Political belief
- Pregnancy and breastfeeding
- Race or ethnicity
- Religious belief or background
- Nationality
- Sexual orientation
- Caste
- Personal association with someone who has or is assumed to have one of these personal characteristics

Favouritism includes:

- Giving preferential treatment to extended family members in recruitment/contracting practices regardless of their qualifications (nepotism)
- Giving preferential treatment to friends regardless of their qualifications in recruitment/contracting practices (cronyism)
- Exchange of sexual favours, even if consensual, in recruitment/career advancement

Please also refer to Anti-Slavery International's **Equal Opportunities Policy Statement** of Intent, as well as the **Equal Opportunities and Discrimination Policy** in part 8-1 of the Staff Handbook.

## Corruption and the abuse of power

Anti-Slavery International acknowledges that we are in a position of power as an organisation and individuals can also be in a position of power. We expect staff to acknowledge when they are in such a situation and not abuse this situation.

The abuse of authority/power is the improper use of a position of influence, power or authority by an individual towards others. This is particularly serious when the alleged offender uses his or her influence, power or authority to negatively influence the career or employment conditions (including, but not limited to, appointment, assignment, contract renewal, performance evaluation or promotion) of other individuals. Abuse of authority can include a one-time incident or a series of incidents. It may also consist of conduct that creates a hostile or offensive work environment, which includes, but is not limited to, the use of intimidation, threats, blackmail or coercion. Decisions made



through the proper use of managerial and supervisory responsibilities are not considered as abuse of authority.

An example of abuse of power is systematically assigning tasks to a staff member or work that is not appropriate to their grade level and/or falls outside of their normal duties, or repeatedly requesting action to be taken on non-urgent matters outside of regular working hours and/or on weekends and holidays. Requiring a staff member to monitor and respond to messages and/or perform other non-urgent work-related duties during these same times may also amount to abuse of authority/power.

Please also refer to the *Working environment* sub-section, as well as to Anti-Slavery International's **Bribery and Corruption Policy**.

Anti-Slavery promotes and prioritises the safety and well-being of all vulnerable adults and children who it comes into contact with through the development, communication, implementation and upholding of clear, up-to-date **Child and Adult safeguarding policies** and procedures. These are mandatory for everyone involved with Anti-Slavery International.

## Use and security of organisational assets

Anti-Slavery International staff are expected to treat Anti-Slavery International assets and property (such as office furniture and supplies, and computers) with all due care to avoid damage or loss. This applies to the use of Anti-Slavery International assets both whilst at work and also outside the office (such as Anti-Slavery International laptops and mobile phones).

Employees are referred to the **Data Protection Policy** and the **Computer Policy** (part 8-12 of the staff handbook) regarding their use of Anti-Slavery International computers. Misuse or excessive use for personal purposes of Anti-Slavery International assets will be dealt with under our Disciplinary Procedure.

Over the years Anti-Slavery International has established a significant body of knowledge and expertise relating to our work. Anti-Slavery International is committed to openness and transparency. Our full approach to sharing information is detailed in the Open Information Policy, which details the types of information that can be made public as well as the exceptions under which certain information is protected (part 4). Information that falls under these exceptions must not be shared or made public without informed permission from the CEO or a member of SMT, who will assess whether the exceptions allowed by the **Open Information Policy** apply.

## Media relationships and press statements

Anti-Slavery International's relationships with the media, and its public image more broadly, are crucial to the success of its advocacy and fundraising activities. All engagement with the press is arranged through the Communications Manager, and our relationship with the media is facilitated by the Communications Team.

It is recognised that various staff from across Anti-Slavery International will at times need to engage with the media or represent Anti-Slavery International in public, for example by speaking at a conference or in a press interview. When this is the case, a member of the Communications Team and the Communications Toolkit should be consulted in advance as appropriate, unless you are already familiar with the relevant type of media engagement. If a staff member has been

approached directly by the media or for example had contact with the media at an external event, they should inform the Communications Manager.

Staff engaging with the media, or writing on social media *on behalf of* Anti-Slavery International, are specifically and formally designated by the Communications Manager. Those staff are responsible for ensuring they post appropriately and accurately, and do not mis-represent Anti-Slavery International's positions, or speak, write or behave in a way that will reflect negatively on Anti-Slavery International. This policy informs the development of an updated social media guidance for staff which includes personal social media posting. For specific guidance in the interim time, it is important that staff consult the Communications Manager for social media use and the relationship between personal accounts and Anti-Slavery.

Where there is any doubt as to the position of Anti-Slavery International on a given question, or as to how to engage with the media or on social media, staff members should err on the side of caution and consult a member of the Communications Manager. You may not permit representatives of the media to enter Anti-Slavery International premises without the permission of the communications manager. Please also refer to the *Use and security of organisational assets* section and the Open Information Policy in relation to what types of information should and should not be shared.

## Managers and supervisors

Anti-Slavery International staff in supervisory positions play an important role in promoting a workplace culture that upholds Anti-Slavery International's ethical principles and reputation, and in ensuring a safe and healthy work environment, including with reference to the principles outlined above. Managers and supervisors lead by example and are expected to:

- Promote and document fair and factual assessments of the performance of the staff members under their supervision, and to make decisions based on fair and factual assessments, regardless of internal or external pressures
- Ensure that internal systems, policies, and procedures are applied consistently and be ready to provide guidance on them (including on this Code) to staff
- Encourage an ongoing dialogue surrounding ethical conduct issues and allow staff to express their concerns and needs
- Encourage the reporting of instances of wrongdoing such as fraud, negligence, or disrespectful behaviour and immediately address misconduct once reported or observed using the existing policies and procedures for this process
- Support staff members who raise an ethical concern and fulfil their commitment for protection against retaliation as stated in the **Whistleblowing Policy**
- Foster a healthy team atmosphere and environment based on mutual trust and respect.

## Bullying and harassment

Anti-Slavery International does not tolerate any form of bullying or harassment.

Bullying is unwanted behaviour that a person finds intimidating, undermining, belittling, embarrassing, humiliating or offensive and which is unacceptable by normal standards and is disadvantageous to the individual. Bullying may be persistent or an isolated incident.

Please also refer to the **Dignity at Work Policy** and **the Harassment Policy** on page 8-3 in the Anti-Slavery International employee handbook.

## Alcohol and drugs

Anti-Slavery International expects staff not to consume alcohol or drugs during working hours or before work, or to use the work environment for distributing, selling or consuming drugs or alcohol. Staff may be required to undergo testing for drugs and alcohol. Please refer to the **Drugs and Alcohol Policy** on page 8-15 of the staff handbook, as well as to the Alcohol and Drugs Misuse section of the Health and Safety Handbook.

### Alcohol and drugs policy

Anti-Slavery International is committed to maintaining a healthy, safe and productive working environment for its employees. Anti-Slavery International recognises the impact that drugs and alcohol have on an individual's ability to work safely and correctly and Anti-Slavery International aims to ensure a working environment free from the inappropriate use of substances and where employees are able to carry out their duties in a safe and efficient manner.

The use of drugs or the consumption of alcohol by employees is inappropriate at any time during working hours and before work. If an employee's doctor prescribes drugs that may affect their ability to perform work, the employee must discuss this with their Line Manager.

The dispensing, distribution, possession, use, sale or offering to buy controlled drugs or alcohol at work or in any work environment is prohibited (with the exception of moderate alcohol consumption under certain circumstances such as networking events). Any such activity (including reasonable suspicion) will be reported to the police.

Any employee found to be in breach of these rules will be liable to disciplinary action that may result in dismissal (please see the **Disciplinary Procedure** for details). This will apply whether or not there is any actual threat to health and safety.

### Testing for illegal substances and alcohol

Anti-Slavery International reserves the right to introduce testing, including random testing, for illegal substances and alcohol.

Any refusal to be tested will be regarded as a refusal to carry out a reasonable instruction and will normally result in dismissal.

## Sexual behaviour

The development of sexual relations between Anti-Slavery International Staff and children (as defined in the Safeguarding of Children and Young Adults Policy) or beneficiaries is in contravention of Anti-Slavery International's **Child and Adult Safeguarding policies**. Any breach, or failure to report such a breach, could result in disciplinary action.

Members of staff should disclose to their line manager or to another member of SMT any relationships they have with an individual member of staff or stakeholder that may impair their ability or judgement in undertaking responsibilities associated with employment in the course of their work, including any sexual relationships between Anti-Slavery International staff at different levels within the organisational hierarchy, or between Anti-Slavery International staff and local partners. Sexual relationships between Anti-Slavery International staff and local partners are strongly discouraged. SMT will review the situation on a case-by-case basis and consider existing and potential conflict of interests and decide whether appropriate actions can be taken which will effectively manage any such conflict of interest. (See section on Conflict of Interest within this policy).

It is the responsibility of each adult working for or representing Anti-Slavery International to ensure that:

- Staff behaviour in any work environment must be appropriate: this means avoiding physical, verbal and sexually suggestive or compromising behaviour, including potentially offensive allusions to unequal power and wealth dynamics or behaviour that could give rise to suspicion or allegations of abuse
- They observe the rules established in this Code of Conduct, in Anti-Slavery International's Safeguarding policies and in the Security Protocols, along with our values and mission statements regarding sexual relationships at work or on missions. Anti-Slavery International staff should act in accordance with Anti-Slavery International's policies and/or UK law at all times but, in addition, when working outside of the UK, staff should refrain from any activities which breach the law of the country they are visiting in order to avoid being criminally prosecuted or potentially harming Anti-Slavery International's reputation, as well as out of respect for local customs
- Note that some countries have established laws against what they deem culturally inappropriate behaviour such as homosexual relationships or unmarried couples living together; at the same time, they may not have laws against certain behaviours such as prostitution and relationships with minors or vulnerable adults that Anti-Slavery International's policies and/or UK law would prohibit. Therefore, while working outside of the UK it is advised for staff to take an informed yet pragmatic approach as ignorance won't offer immunity
- Avoid unacceptable situations within a relationship of trust by adhering to our relevant policies (**Safeguarding of Children and Young Adults Policy, Vulnerable Adults Policy, Dignity at Work Policy**)
- Follow the procedures outlined in the staff handbook (section 8) following suspicion, disclosure or allegation of sexual abuse
- Encourage others to challenge and report any attitudes or behaviours they deem unacceptable - treat all concerns, allegations and concerns of abuse seriously. For reporting misconduct, staff are referred to the **Whistleblowing Policy, Anti-Bribery Policy** (particularly section 8 and Appendix 1), **Anti-Fraud Policy** (particularly Section 3), Child Safeguarding Policy (particularly Section 8 and Appendix F), and **Vulnerable Adults Safeguarding Policy**
- Sexually abusive behaviour such as using influence to obtain sexual favours from others may will be treated as gross misconduct, resulting in disciplinary procedures and may be reported to the authorities, in line with the law of the land.

Staff are also referred to the **Safeguarding Children and Young People Policy** and the **Vulnerable Adults Safeguarding Policy**, to which this section relates.

## Use of weapons

Anti-Slavery International is against carrying or handling any kind of weapon (or imitation) on our premises, donor and partner premises, or the field environment. Staff on overseas missions should always adhere to the mission security protocol provided.

If staff are found to be in possession of weapons or imitation within the confines of work - this is in violation of Anti-Slavery International policy and culprits will face disciplinary procedures and potentially criminal prosecution.

UK legislation is interpreted in different ways by different police authorities – even more so in international jurisdictions therefore staff should be mindful of use of weapons outside of work and missions as violation or criminal offences concerning firearms may affect your position within Anti-Slavery International and might bring the organisation to disrepute.

## Criminal records

Some roles may require DBS checks (See Anti-Slavery International’s Safeguarding Policies). The need for other types of disclosure for specific roles will be considered as part of the development of a Recruitment Policy.

## Enforcement of the Code of Conduct

All staff and volunteers are responsible for ensuring their own conduct is in accordance with this policy. Anti-Slavery International has a Disciplinary Procedure which defines the process of enforcement and action to be taken in response to unsatisfactory conduct, misconduct, serious misconduct, and gross misconduct (including prosecution and dismissal as potential actions).

Responsibility for implementation should fall on the Head of Finance and Resources, supported by SMT.

Anti-Slavery International will publish the Code of Conduct in hard copy as a section in the employee handbook issued upon commencement of employment, for reference and people representing Anti-Slavery International. The Code of Conduct should be updated every three years, or earlier should significant changes in the law or key events deem it appropriate.

## Appendix A: statement of commitment

### **Anti-Slavery International Statement of Commitment to Code of Conduct**

I, \_\_\_\_\_ [name], have read and understood the procedures and guidelines outlined in Anti-Slavery International's Code of Conduct.

I agree with the principles contained within this document and agree to implement and promote the procedures and practices contained therein while working or associated with Anti-Slavery International.

I understand that failure to comply could result in:

- Employed Staff & interns – disciplinary action
- Freelance Staff / Contractors – termination of contract
- Trustees – termination of Board membership
- Volunteers – ending the relationship with Anti-Slavery International

(The above list of penalties is for example purposes only, and is not exhaustive.)

\_\_\_\_\_  
(Print name)

\_\_\_\_\_  
(Job title / role)

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Date)