



# FCA Code of Conduct Policy

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## Definition of Terms

For the purposes of this Code of Conduct Policy, the following definitions apply:

**Abuse of power:** Any abusive behaviour (physical, psychological, sexual, or emotional) by a person in a position of authority or trust against another person in a position of vulnerability and/or dependency.

**Fraud and corruption:** Financial abuse concerning, but not limited to, fraud, embezzlement, theft, bribery, nepotism, or misuse of funds or resources in order to gain an unfair or illegal advantage.

**Conflict of Interest:** A conflict of interest occurs when an individual's personal interests – family, friendships, financial, or social factors – could be considered compromising his/her judgment, decisions, or actions in the workplace.

**Gender based violence:** Refers to harmful acts directed at an individual based on their gender. It is rooted in gender inequality, the abuse of power and harmful norms. Gender-based violence can include sexual, physical, mental, and economic harm inflicted in public or in private. It also includes threats of violence, coercion, and manipulation. This can take many forms such as intimate partner violence, sexual violence, child marriage, female genital mutilation and so-called 'honour crimes'

**Long-term relationship:** An intimate, interpersonal relationship that may last several months, and may or may not consist of a marriage.

**Sexual exploitation:** Any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another.

**Sexual abuse:** Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

**Sexual harassment:** A continuum of unacceptable and unwelcome behaviours and practices of a sexual nature that may include, but are not limited to, sexual suggestions or demands, requests for sexual favours, verbal or physical conduct or gestures, which are or might reasonably be perceived as offensive or humiliating.

**Whistleblower:** An individual who reports or discloses information about wrongdoing, e.g., breach of the Code of Conduct, that otherwise would not be known.

## 1. Introduction

This Code of Conduct Policy is guided by respect of fundamental human rights, social justice and human dignity, and endorses the Code of Conduct for the International Red Cross and Red Crescent Movement and NGOs in Disaster Relief, as well as the ACT Alliance Code of Conduct.

Dissemination of this policy is supported by FCA Safeguarding Policy and FCA Complaints Policy, and it is linked with FCA Disciplinary Procedure and country programme HR manuals.

### Purpose

The main purpose of this Code of Conduct Policy is to promote accountability and outline the key responsibilities of FCA staff. The policy seeks to protect staff, members of the communities that FCA works with and other people from harm and uphold their rights and dignity. The Code of Conduct Policy is FCA's public statement about our commitments to high standards of conduct and ethical behaviour.

The policy also encourages engagement with and feedback from communities and people FCA works with, by setting out transparently the standards of conduct FCA is requiring its people to uphold, and how and when to report in cases when these standards are breached.

### Scope

The 'Staff Code of Conduct applies to all staff, including but not limited to all permanent and temporary employees, consultants, interns, observers, volunteers, and any other individuals whilst under contract with or otherwise representing FCA, including members of Board of Directors. Scope of the 'Code of Conduct for Visitors' and the "Code of Contact for Contractors and Service Providers" is defined in the documents in concern.

All implementing partners must have in place a Code of Conduct that covers the principles set out under section 3 of the Staff Code of Conduct, or they must apply FCA's Code of Conduct.

### Dissemination

FCA with respective management has the responsibility to ensure that all FCA employees and other staff are aware of this Code of Conduct, that they understand what it means in concrete behavioural terms, and how it applies to their working environment. FCA also shall make sure that the communities FCA works with, and other key stakeholders are aware of expected behaviour of FCA staff and know how to report breaches.

## 2. Standards of behaviour

The standards of staff and visitor behaviour are set out in the Code of Conducts (Annexes 1 and 2), that are an integrated part of this policy. The standards underpin adherence to following principles:

- fundamental human rights and non-discrimination
- observance of international and national laws
- compliance with FCA's internal rules and regulations
- zero tolerance on any form of gender-based violence, including but not limited to sexual exploitation, abuse, and harassment
- zero tolerance on fraud, bribery, and corruptive behaviour
- prevention of terrorism
- staff security and wellbeing
- respect to all people, including colleagues
- professional conduct

### **3. Misconduct**

Any breach of the Code of Conduct is a form of misconduct and will lead to disciplinary measures or sanctions, up to and including termination of contract of employment or other contract, and/or legal action as appropriate.

The breaches of the policy constituting a gross misconduct, include but is not limited to sexual exploitation, abuse, and harassment, physical or psychological abuse, fraudulent and corruptive action, bullying and retaliation, any retaliatory action taken against a whistleblower, complainant or witness, serious malpractice, and serious abuse of power. Reports on gross misconduct must be submitted and processed with urgency.

### **4. Duty to report misconduct**

Staff must at all times report immediately any knowledge, concerns, or substantial suspicions of breaches of the Code of Conduct through a channel as appropriate (e.g., country office or global complaints mechanism).

### **5. Whistleblower protection**

FCA is committed to creating and maintaining a safe environment where individuals can raise reasonable concerns without any risk of losing their employment or entitlements, suffering any form of retribution in the workplace or retaliation in any form.

FCA abides the [EU directive 2019/1937 on the protection of persons who report breaches of Union Law](#) (“Whistleblowing Directive”) and related national legislation. Reported breaches of the Code of Conduct are processed in accordance with strict privacy and confidentiality standards, and identity of the whistleblower will be protected. The name of the whistleblower shall be disclosed to the other parties only with his/her consent. In case whistleblowing leads to later criminal proceedings, local laws apply to the right of the suspected/charged person to access information. Retaliatory actions taken by FCA management or FCA staff against a person who reports a misconduct are not tolerated. Any such action will be considered as gross misconduct and will be a subject to disciplinary action in accordance with FCA’s disciplinary procedures.

### **6. Malicious reporting**

Malicious reporting refers to a complaint being made without reasonable suspicion of misconduct, for the purposes of intentionally harming another person’s reputation and/or undermining their professional and personal integrity. Malicious reporting is not tolerated by FCA and is subject to disciplinary action. However, complaints that are made in good faith but that turn out to be unsubstantiated are not considered malicious reporting.

### **7. Investigations**

All staff members have the duty to cooperate when requested with any investigation into alleged breaches related to this Code of Conduct.

### **8. Disciplinary measures**

Breach of the Code of Conduct may, in accordance with relevant legislation, be a ground for disciplinary measures, up to summary dismissal or contract termination, and when applicable, criminal prosecution.

## 9. Duties of management

Management has the duty to:

- Lead by example.
- Create and maintain organisational culture that underpins compliance with this policy, safe environment to report misconduct, and non-retaliation against a whistleblower.
- Promote awareness of the FCA Code of Conduct Policy and make sure all those they supervise have the knowledge and resources they need to comply with it.
- Ensure that the Code of Conduct Policy is available in languages relevant to the context of operation.
- Ensure that the communities FCA works with, and other key stakeholders are aware of expected behaviour of staff as per this Code of Conduct, and how they can report misconduct.
- Remove distractions and listen to anyone who raises a misconduct concern, and show concern for their safety and overall well-being as appropriate.
- Address concerns in their capacity to resolve and escalate misconduct concerns through appropriate reporting channel such as FCA's global complaints mechanism.

The Code of Conduct is a mandatory element during induction, and refreshers must be organised using appropriate means and fora.

All staff have an individual responsibility to familiarise themselves and their dependents with this Code of Conduct and its purpose.

## 10. Adherence to the Code of Conduct

The Staff Code of Conduct forms part of the contract of employment and is applicable at all times, while on duty and off duty.

The FCA Code of Conduct is valid until the staff member ceases to represent or work for FCA. The signatory accepts the consequences of any violation of any of the above provisions under this Code of Conduct Policy.

## 11. Validity

This Code of Conduct Policy shall be subject to periodic revision and review.

## 12. Annexes

Annex 1: FCA Staff Code of Conduct

Annex 2: FCA Code of Conduct for Visitors

*(Annex 3: 'FCA Code of Conduct for Contractors and Service Providers' will become available later in 2022)*



## Annex 1: FCA Staff Code of Conduct

### 1. Scope and purpose

In keeping with its mission, vision and values, Finn Church Aid (FCA) is committed to maintaining the highest degree of ethical conduct amongst all its staff.

This Code of Conduct applies to all staff, including but not limited to all permanent and temporary employees, consultants, interns, observers, volunteers, and any other individuals whilst under contract with or otherwise representing FCA, including members of Board of Directors.

The purpose of this Code of Conduct is to set out the conduct expected of FCA staff whilst under contract to the organisation, and forms part of the related contract. The Code of Conduct is applicable at all times, while on duty and off duty.

Breaches of the Code of Conduct are grounds for disciplinary action, up to and including dismissal of an employee or dissolving a contract of other type.

FCA recognises that local laws and cultures differ considerably from one country to another. As an International Non-Governmental Organisation, FCA adheres to relevant international codes and standards, such as the Code of Conduct of the Red Cross/Red Crescent Movement, and the IASC Plan of Action and Core Principles of Codes of Conduct on Protection from Sexual Abuse and Exploitation in Humanitarian Crises. FCA staff shall uphold local law wherever they operate, except where the Code of Conduct is more stringent, in which case the Code of Conduct applies.

### 2. Mission and values

Our mission is “Action for human dignity”

Our values are: Unconditional love for our neighbours, Unyielding hope, Courage, and Respect

### 3. Code of Conduct Standards

#### 3.1 I will uphold the integrity and reputation of FCA by ensuring that my professional and personal conduct is consistent with FCA’s mission, values, and standards

- a) I will respect and promote fundamental human rights and will not discriminate against any individual.
- b) I will respect and abide by national and international laws, and FCA policies and guidelines
- c) I will treat all people, including my colleagues, fairly, equally and with respect and dignity, regardless of their religion, political or ideological conviction, gender, sexual orientation or identity, ethnicity, language, health, disablement, age, or personality - including in social media and other online platforms.
- d) I will not use my position as FCA staff to proclaim or advance any political, ideological, or religious conviction.
- e) When working in an international context or travelling internationally on behalf of FCA, I will be sensitive to local customs and culture.
- f) I will seek to ensure that my conduct does not bring FCA into disrepute and does not impact on or undermine my ability to undertake the role for which I am employed.

- g) I will not drink alcohol or use any other substances in a way that affects my ability to carry out my role as a staff member or leads me to treat other people in a way that may expose FCA or its stakeholders to reputational or other risks.
- h) I will not drive a vehicle when under the influence of alcohol or other substances.
- i) I will not use or carry about my person, in my luggage or in an FCA's vehicle any weapons or ammunition when on duty.
- j) I will not consume, purchase, sell, possess, or distribute illegal substances.

### **3.2 I will not engage in abusive or exploitative conduct, or any form of gender-based violence**

- a) I will not physically, emotionally, or psychologically abuse or assault a child, vulnerable adult, or any other people, including gender-based violence in any form.
- b) I will not sexually exploit, abuse, or harass any individual.
- c) I will not engage in any form of exploitative activities with children, vulnerable adults, or any people, including child labour or human trafficking as well as consuming, purchasing, selling, possessing, and distributing of child sexual abuse material in any form.
- d) I will not engage in sexual activity with children (persons under the age of 18) or vulnerable adults. Mistaken belief in the age of a child is not a defence.
- e) I will not visit bars, restaurants, or other premises where minors are exposed sexually.
- f) I will not exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. This includes any exchange of assistance that is due to beneficiaries of assistance. I will never abuse a position to withhold development or humanitarian assistance, or give preferential treatment, to solicit sexual favours, gifts, payments of any kind, or advantage.
- g) I will not engage in sexual relationship with beneficiaries of humanitarian assistance, given their increased vulnerability and since such relationships are based on inherently unequal power dynamics.
- h) I will inform my line manager when engaging in an intimate long-term relationship with a member of a community that is benefitting from a development or advocacy programme or another staff member, to prevent perception of a conflict of interest and distortion of power dynamics.

### **3.3 I will uphold the safety, health, and welfare of all FCA staff members and associated persons (volunteers, partners, suppliers, and contractors)**

- a) I will adhere to all legal and organisational health and safety requirements at my location of work.
- b) I will comply with any local security guidelines and will inform management of any necessary changes to such guidelines as need be.
- c) I will behave in a manner such as to avoid any unnecessary risk to the safety, health and welfare of others or myself, including partner organisations, and communities and individuals with whom we work.

### **3.4 I will be responsible for the use of information, assets, and resources to which I have access due to my engagement with FCA**

- a) I will be accountable for, and use assets, vehicles, equipment, and other resources entrusted to me in responsible manner for the reason intended.
- b) I will use IT technology for the appropriate professional or private use, only.

- c) I will not use FCA IT equipment, software or e-mail and social media platforms to engage in activity that is illegal under local or international law, or that encourages conduct that would constitute a criminal offence. This includes any material that intimidates or harasses any individual or group of people based on protected characteristics or encourages extremism.
- d) I will not use FCA IT equipment to view, download, create, distribute, or save in any format inappropriate or abusive material, including but not limited to, pornography or child abuse.

### **3.5 I will safeguard personal information and obtain permission for using images and stories**

- a) I will protect and safeguard any personal information collected from communities or other sources that could put people at risk, in accordance with specific guidance provided by FCA.
- b) I will, including social media and other digital media, online or offline, obtain written permission or verbal consent as appropriate, when taking pictures/filming individuals or groups of people in FCA working context. Concerning a child or children, I will obtain verbal informed consent from a parent/guardian. I will always follow specific instructions provided by FCA.

### **3.6 I will perform my duties and conduct my private life in a manner that avoids conflicts of interest**

- a) I will declare to my line manager or other management or staff as appropriate, any known or potential conflicts of interest in matters of official business, which may affect to the work of FCA (e.g., direct relationship with service provider or suppliers of goods for humanitarian or development programmes).
- b) I will not be involved in awarding benefits, contracts for goods or services, employment, or promotion within FCA, to any person with whom I have a financial, personal, family, or close intimate relationship.
- c) I will inform FCA before agreeing to being nominated as a prospective candidate or appointed to an official role that may appear to undermine FCA's neutrality and impartiality.

### **3.7 I will not be involved in any criminal and unethical activities**

- a) I will be transparent, accountable, and honest in all work-related decision-making and financial transactions.
- b) I will ensure that financial and other resources are used solely for the intended purpose in effective and efficient way.
- c) I will conduct all business in accordance with national and international laws and standards, FCA requirements, and ethical principles.
- d) I will never steal, misuse, or misappropriate funds, property, or any other income.
- e) I will never engage in abusive transactions, forging of documents, money laundering, terrorist financing, taking of commissions or influencing tender process for personal benefit, or other illegal business activities
- f) I will never 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, FCA's credibility or integrity.
- g) I will never share unjust profits such as kickbacks, cuts, or discounts for improper personal or organisational benefits.



- h) I will not accept any gifts, remunerations or other favours from governments, communities with whom we work, donors, suppliers and other persons that may influence or may appear to influence the performance of staff functions or duties.
- i) I will not acquire, use, or distribute known unsafe products or supplies in any development or humanitarian setting.
- j) I will not engage in using of or benefit from illegal labour, child labour or forced labour.
- k) I will ensure, where possible, that goods and services 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) I will work to prevent or mitigate the risk of intentional diversion of FCA funding and assets to armed groups, including but not limited to groups or individuals designated as terrorists by Government and International Institutions identified in FCA policy.

### **3.8 I will uphold confidentiality**

- a) I will exercise due care in all matters of official business, and not divulge any confidential information relating to colleagues, work-related matters, workplace investigations or any sensitive information unless legally required to do so.

### **3.9 I will report breaches of the Code of Conduct and maintain safe environment for reporting**

- a) I will report immediately any breach of this Code of Conduct that I have witnessed or suspect through FCA Global Complaints Mechanism ([complaints@kua.fi](mailto:complaints@kua.fi)) or the Country Office Complaints Focal Point/Complaints Mechanism, as appropriate.
- b) I will refrain from retaliation of any form against a colleague or other person reporting a misconduct.

### **3.10 I will cooperate in investigations**

- a) I will cooperate when requested with any investigations into alleged breaches of this Code of Conduct.

## **4. Understanding the Code of Conduct**

With my signatory below, I confirm that I have read and understood the Code of Conduct above, that the Code of Conduct is valid until I cease to represent or work for FCA, and that I accept the consequences of any violation of the Code of Conduct.

Name:

Signature:

Date:



## Annex 2: FCA Code of Conduct for Visitors

### 1. Scope and purpose

In keeping with its mission, vision and values, Finn Church Aid (FCA) is committed to maintaining the highest degree of ethical conduct amongst all its staff and associated personnel.

This Code of Conduct applies to all visitors that FCA hosts in its operation countries, excluding the guests to whom the Staff Code of Conduct applies. The Code of Conduct is applicable at all times during the visit.

FCA recognises that local laws and cultures differ considerably from one country to another. As an International Non-Governmental Organisation, FCA adheres to relevant international codes and standards, such as the Code of Conduct of the Red Cross/Red Crescent Movement, and the IASC Plan of Action and Core Principles of Codes of Conduct on Protection from Sexual Abuse and Exploitation in Humanitarian Crises.

FCA's visitors shall uphold local law, except where the Code of Conduct is more stringent, in which case the Code of Conduct applies.

Breaches of this Code of Conduct may constitute grounds for disciplinary action. Any suspicions or concerns of serious breaches of this Code of Conduct committed may lead to the immediate removal of access to FCA sites and projects and termination of the visit. In this event, any relevant costs will be the responsibility of the visitor to bear. Any suspicions or concerns of breaches of the Code of Conduct committed by the visitor may also be reported to the visitor's employer, when relevant.

In cases where suspicions or concerns of breaches of the Code of Conduct involve sexual exploitation or abuse, FCA may refer such cases to local authorities, in addition to the relevant authorities in the home country of the visitor for criminal prosecution.

### 2. FCA's Mission and Values

FCA's mission is "Action for human dignity"

FCA's values are: Unconditional love for our neighbours, Unyielding hope, Courage, and Respect

### 3. Code of Conduct Standards

#### 2.1 I will uphold the integrity and reputation of FCA by ensuring that my personal conduct is consistent with FCA's mission, values, and standards

- a) I will respect and abide by national and international laws, and the guidance and instructions introduced to me by FCA.
- b) I will treat all people, including my fellow visitors and FCA staff, fairly, equally and with respect and dignity, regardless of their religion, political or ideological conviction, gender, sexual orientation or identity, ethnicity, language, health, disablement, age or personality - including in social media and other online platforms.
- c) I will be sensitive to local customs and culture.

- d) I will seek to ensure that my conduct does not bring FCA into disrepute and does not impact on or undermine my integrity as visitor.
- e) I will not drink alcohol or use any other substances in a way that affects negatively to my judgement or leads me to treat other people in a way that may expose FCA or its stakeholders to reputational or other risks.
- f) I will not drive a vehicle when under the influence of alcohol or other substances.
- g) I will not consume, purchase, sell, possess or distribute illegal substances.

## **2.2 I will not engage in abusive or exploitative conduct**

- a) I will not engage in any form of exploitative activities with children, vulnerable adults, or any people, including child labour or human trafficking as well as consuming, purchasing, selling, possessing and distributing of child sexual abuse material in any form.
- b) I will not engage in sexual activity with children (persons under the age of 18) or vulnerable adults. Mistaken belief in the age of a child is not a defence.
- c) I will not visit bars, restaurants or other premises where minors are exposed sexually.
- d) I will not exchange of money, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour.
- e) I will not harass sexually or mentally any individual.

## **2.3 I will uphold the safety, health, and welfare**

- a) I will adhere to all legal and organisational health and safety requirements.
- b) I will comply with any FCA security guidelines and will inform my hosts of any security concerns and incidents.
- c) I will behave in a manner such as to avoid any unnecessary risk to the safety, health and welfare of others and myself.

## **2.4 I will follow instructions provided by FCA regarding using images and stories**

- a) I will follow specific instructions provided by FCA about taking pictures of and filming people in project sites and in the context where FCA operates and only share this material publicly with prior authorisation obtained by FCA.
- b) I will, including social media and other digital media, online or offline, obtain written permission or verbal consent as appropriate, when taking pictures/filming individuals or groups of people in FCA working context. Concerning a child or children, I will obtain verbal informed consent from a parent/guardian. I will always follow specific instructions provided by FCA.

## **2.5 I will refrain from unethical business practices**

- a) I will not accept any gifts, remunerations or other favours from governments, communities with whom we work, donors, suppliers and other persons that may appear to influence on FCA.
- b) I will ensure, where possible, that goods and services I purchase are produced and delivered under conditions that do not involve the abuse or exploitation of any persons.

## **2.6 I will uphold confidentiality**

- a) I will exercise due care in all matters of official business, and not divulge any confidential information regarding FCA, its staff or its operation.

## **2.7 I will report breaches of the Code of Conduct**

- a) I will report immediately any breaches of this Code of Conduct that I witness or suspect to the tour leader, FCA Country Director, or through FCA complaints mechanism ([complaints@kua.fi](mailto:complaints@kua.fi)).

## **4. Understanding the Code of Conduct**

With my signatory below, I confirm that I have read and understood the Code of Conduct above, that the Code of Conduct is valid as I am hosted by FCA, and that I accept the consequences of any violation of this Code of Conduct.

Name:

Signature:

Date: