

CODE OF CONDUCT

HUMANITARIAN ORGANIZATION FOR
PROTECTION AND EDUCATION - VELA



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1. Introduction

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

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

2. Background

The Code of Conduct is endorsed by the Directors of the organization. The Code of Conduct lays out VELA’s expectations and guiding principles for appropriate behaviour in the office and in the field. By agreeing to work for or with VELA, team members agree to comply with its policies and procedures and to uphold the highest standards of personal and professional conduct to ensure that VELA’s integrity and reputation will not be jeopardized by their actions.

For VELA employees, this Code of Conduct is an integral part of their induction process and their conditions of employment. It is therefore an inseparable part of their individual employment contracts. Directors, management staff, volunteers, interns and visitors are also expected to read and sign it.

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



3. Basic Values And Principles

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

4. Work Environment

VELA maintains a policy of equal treatment, equal opportunities and mutual respect among all employees, volunteers and others working in the framework of its operations. All staff, management and contracted parties fully comply with the mission, objectives and principles of VELA and strictly follow the present code of conduct.

Anyone who feels they have not been treated accordingly has the right to report so. VELA will carry out all possible internal actions to resolve such issues. No member of staff or management will be discriminated against, be subject to abuse or threat for reporting any incident against them or others.

All staff:

- Treat their co-workers and all persons involved with VELA with respect, fairly, with kindness and respecting their differences.
- Dress and behave appropriately and in line with the work and role of VELA. All items of clothing will be suitable for the work environment and will not contain offensive or objectionable material (slogans or graphics)
- Contribute to a friendly and positive work environment based on mutual understanding and respect for each other's viewpoints and backgrounds.
- Abide by the Internal Operating Procedures of VELA and follow all policies and procedures. Work to achieve VELA's mission, exchange ideas and viewpoints and provide constructive feedback aiming to work as a team to achieve objectives. Coordination and efficient communication are key to the success of VELA's work.



- Always offer assistance in a way that is impartial, non-discriminatory, and unconditional.
- VELA's structure exists to ensure that accountability flows up and down across all its activities. All employees must defer to team leaders and respect decisions delegated to them. Project Managers and Team Leaders are expected to consult with their teams before making and delegating decisions.
- Are dependable, recognize the commitment and responsibility to their assignment, accept assignments with an open mind and a willingness to learn and accept feedback from their supervisor to do the best job possible.
- Address ethical concerns by speaking directly with the colleague with whom they have the concern; and when necessary, report such to their Manager in the defined chain of command.
- Report concerns with internal conduct to their immediate supervisor, who is obligated to address the issue and either explain or alter the offending behavior. If they do not feel comfortable raising this issue with an immediate supervisor, they will consult with the senior leadership of VELA to address any ongoing issues with the immediate supervisor.

5. Fair Treatment, Harassment And Discrimination

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

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

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

Staff and management:

- Will not engage in or tolerate any form of harassment in the workplace, including sexual harassment and abuse of power.



- Managers will not solicit favours, loans, or gifts from staff, nor will they accept unsolicited ones that are of more than a token value.
- Will recognize that there is an inherent conflict of interest and potential abuse of power in having intimate and sexual relations with staff under their supervision. They should be aware that VELA strongly discourages such relations. Should the staff and management find themselves in such a relationship, they will resolve this conflict of interest without delay.
- They will not engage in or tolerate or engage in any form of harassment in the workplace, including sexual harassment, sexual exploitation or abuse of beneficiaries.
- They will not harass anyone in the workplace on the grounds of any kind of diversity/difference.
- Will not make gestures or sexual remarks about someone's body, clothing, or appearance.
- Will not ask questions about someone's sex life.
- Will refrain from making racist or sexually offensive jokes.
- Will not make sexual comments or jokes about someone's sexual orientation or gender reassignment.
- Will refrain from sexting and online bullying.
- Will not make sexually suggestive remarks.
- Will not make physical contact such as touching or pinching.
- Will not abuse the power and influence that they have by their position over the lives and well-being of the beneficiaries.
- Will never request any service from the beneficiaries in return for protection or assistance.
- Will never engage in any exploitative relationships, emotional, financial or employment related with beneficiaries.
- Will not engage in sexual activity with children under the age of 18. Mistaken belief of the age of the child does not constitute a defense.
- Will neither solicit, nor engage in commercial exchange of sexual services, as such relationships may undermine the credibility and the image of VELA.



6. Conflict Of Interest

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

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

All staff will:

- Implement their formal duties and their private affairs in such a way to avoid potential conflict of interest.
- Work to promote the mission, values and objectives of VELA and ensure that their personal views, behavior and convictions (including political and religious convictions) will not hinder their formal role and responsibilities for VELA.
- Their actions will be free of any personal interest or benefit and will counter any unjustifiable political pressure in decision making. They will not seek or accept any directive regarding the due implementation of their role and duties by any government or authority



other than VELA. Any relation with a supplier or vendor or subcontractor or business ally, or partner etc., which may cause conflict of interest will be declared.

- Will not accept any favor, gift, fee or bribe by any authority, nor will they accept any of the above by any source other than VELA without prior approval by the Directors.
- Will not conduct any external activity or work without prior approval by the Directors. They will not accept complementary fees or remuneration by the state or other sources.
- Not receive or provide bribes including illegal remunerations of any kind.
- No member of VELA will vote or participate in any discourse for procurement decision making, upon which there is personal interest.
- Will not accept supplementary payments or subsidies from a government or any other source or participate in certain political activities such as standing for or holding public office without prior authorization.
- Will avoid assisting private persons or companies in their undertakings with VELA where this might lead to actual or perceived preferential treatment.
- Will never participate in activities related to procurement of goods or services, or in human resource activities, where a conflict of interests may arise.

7. Activities Countering the Values And Mission Of VELA

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

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

8. Provision Of Services

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



- Interact with beneficiaries without discrimination on any terms i.e. based on race, gender, ethnicity, political views, disability, religion or other. They consider the experiences and background of beneficiaries and more importantly, the power imbalance entailed in interacting with staff.
- Consider the impact that their work and interaction with beneficiaries may have on their lives.
- Are up to date with policies, objectives, activities and processes of VELA's interventions.
- Make any effort to protect the rights of vulnerable groups and beneficiaries and counter any form of exploitation or harm on beneficiaries and other vulnerable individuals.
- Never exploit the vulnerability of any target group, or person/s to be put into compromising situations.
- Do not preach to anyone or pressure anyone to accept any political, cultural, or religious beliefs. Proselytisation is strictly prohibited.

9. Protection Of Personal Data And Confidentiality

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

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



the beneficiary, the consent form must be signed by the beneficiary in order for the necessary information to be shared.

Volunteers and interns are responsible for maintaining the confidentiality of all proprietary or privileged information to which they are exposed while serving, whether this information involves staff, volunteers, interns, beneficiaries or other persons.

Staff and management:

- Will exercise due care in all matters of official business, and not divulge any confidential information about beneficiaries, colleagues and other work-related matters in accordance with the terms of employment and current guidelines.
- Will protect, manage, and utilize VELA's human, financial, and material resources efficiently and effectively, bearing in mind that these resources have been placed at VELA's disposal for the benefit of the humanitarian work that it implements.

10. Conduct

All staff work and behave according to the following principles:

- Do not make use of or exploit their power vis-à-vis the beneficiaries or others in a state of need.
- Never engage in any form of exploitative relation i.e. sexual, personal, financial, or other with beneficiaries and persons seeking or receiving assistance.
- Will make appropriate and mindful use of VELA's resources including personnel, financial, in-kind or other, for efficiency and effectiveness.
- Will demonstrate integrity, truthfulness, professionalism, transparency, dedication, consistency and honesty in their actions.
- Will be patient, respectful and courteous to all persons with whom they deal in an official capacity, including persons of concern, representatives of operational and implementing partners, governments and donors.
- Will observe local laws, will meet all their private legal and financial obligations, and will not seek to take personal advantage of any privileges that have been conferred on them in the interest of VELA.



- Will do their utmost to ensure that the conduct of members of their household does not reflect unfavorably on the integrity of VELA.
- Will show respect to all colleagues, regardless of status or position and will allow all colleagues the opportunity to have their views heard, and to contribute from their knowledge and experience to team efforts.
- Will not record the content of any meetings without the express permission of the team leader and attendees.
- Will not gossip about their colleagues or the organization as a whole. They will promote positive engagement with all employees and use formal channels to raise issues of concern they have with the organization.
- Will respect their colleagues' privacy and avoid spreading misinformation. They will not have private conversations at the workplace which may distract others, or which may expose anyone to others' gossip.
- They will communicate openly and share relevant information (subject to confidentiality requirements) with other colleagues and will endeavour to respond in a timely manner to queries and emails
- Will use internal procedures and processes to express unhappiness or dissatisfaction and will not use social media for such purposes.
- Though they might disagree with a colleague, or with a manager, they will seek to resolve differences and solve problems when they arise, and will contribute to building constructive dialogue, guided by mutual respect and an open, positive approach between management and staff representatives. They will accept that not all the changes which they wish to promote will necessarily be adopted by VELA.
- Managers will be open to the views of all team members and will provide timely feedback on the performance of each team member through guidance, motivation, and full recognition of their merits.

The management:

- Are responsible for their exemplary conduct during and outside of working hours.
- Will not participate or accept any form of harassment in the workplace including bullying, sexual harassment and exploitation of power.



- Will be open to feedback by all members of staff and will revert on the performance of all staff members through guidance, incentives, and constructive feedback.
- Will not request or accept any favors, loans or gifts from staff, nor accept offers that have significant value.

11. Safety, Health And Welfare

Staff and management:

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

12. Promotion And Communication

VELA:

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

The staff:

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



inappropriate should not be transformed, transferred or disseminated, uploaded, or downloaded, on any of VELA's hardware.

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

13. Fundraising

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

14. Fraud-Bribery

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

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



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

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

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

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

The Safeguarding Lead will evaluate the complaint. Any initial response will be made within 48 hours. Following the gathering of facts, a strategy meeting will be concerned to consider next steps. Depending on the nature of the allegation a response will be made.

Should the complainant wish it, complaints may be anonymised.

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



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

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

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

