



THE HALO TRUST
CODE OF CONDUCT
(Incorporating Values and Standards)
Latest Revision: 15 January 2020

The following HALO policies are referred to in this Code of Conduct and should be read in conjunction with it:

A4 – Conflicts of Interest.

A7 – Gifts and Hospitality Code for Trustees and Senior Management.

B4 – Anti-Fraud and Bribery.

D5 – Whistleblowing.

D6 – Safeguarding.

D7 – Equality and Diversity.

E2 – Information Security Management.

E7 – General Data Protection.

E8 – Data Retention and Management.

E9 – Confidentiality and Non-Disclosure.

HALO Trust Code of Conduct

1. **Introduction.** The HALO Trust is committed to ensuring that staff, volunteers and beneficiaries are protected from any harm (whether moral, emotional, verbal, sexual, physical, or financial); children and vulnerable people are foremost in this commitment. Our Code of Conduct (which incorporates the Charity's Values and Standards) provides anybody who directly, or indirectly works for HALO with explicit guidance on what is expected of them. All staff, partners and contractors¹ must understand and adhere to it to ensure that the highest standards of professionalism are matched by behaviour which is always beyond reproach.

2. **Values and Standards.** HALO has six values and three standards; using and meeting them is an individual duty and employment condition, but leaders at every level also have a responsibility for ensuring that staff, partners and contractors clearly understand and abide by our Values and Standards.

a. **Values.** HALO's values are the principles and characteristics we expect our staff to uphold and display; foremost we should always seek to proactively *identify and do the right thing*. The application of our values and standards is essential to effective safeguarding and security and is fundamental to the protection of children and vulnerable people.

(1) **Moral Courage** – to do that which stops, prevents, or denies any opportunity for wrongdoing, whatever the conditions, or pressures. Physical courage – putting yourself in harm's way to protect/ support others - is implicit and there are circumstances where it might be required. The moral courage of our staff is *the* essential component of HALO's ability to prevent, intercept and deal with any form (or allegation) of abuse.

(2) **Discipline** – the determined, rigorous and cost efficient use of time and resources to deliver HALO's outputs, putting HALO's purpose(s) before self-interest and personal ambitions; getting the job done thoroughly and to the highest of standards, whatever the temptations, or reasons not to.

(3) **Integrity** – to uphold the right moral and ethical standards. This includes honesty, reliability, consistency and judgement and speaking *up* for what we believe in as well as speaking *out* against poor practice, or behaviour which impacts the safety and security of HALO's staff and beneficiaries, particularly the vulnerable.

(4) **Respect for others** – to treat others as we would expect to be treated (whatever their race, gender, or sexual orientation); understanding and considering the needs and expectations of others and respecting their opinions and feelings, even if we don't agree with them.

(5) **Loyalty** - loyalty to each other, the *whole* team and to HALO's purpose and ethos. Loyalty is a component of teamwork and transforms groups of diverse and disparate individuals into a cohesive and effective whole; it is therefore central to our organisational success.

(6) **Selfless commitment** - putting the needs, safety and security of others (and of the organisation) before our own.

¹ This description includes suppliers, external consultants and third-party representatives.

b. **Standards.** HALO's standards provide the framework within which our values must be applied. Our behaviour must be:

(1) **Lawful.** We must comply with the standards expected of us by our own SOPs, by donors, the Charity Commission, UN²/ UK/ US/ EU law and the laws of host-countries. Where a host-country has laws which are different to UN/ UK/ US/ EU, we must ensure that we uphold the laws which correspond to our values, while respecting (and without compromising our relationship with) the host-country. *We must operate within the spirit, as well as the letter of the law* – where there is ambiguity we must have the integrity to comply as is intended, rather than choosing to manoeuvre around legislation.

(2) **Appropriate.** We must behave as we would wish others to behave towards us – in a decent, respectful, consistent and considerate way. Where circumstances require robust leadership it must be provided (and accepted), but 'appropriate' includes having the professional and personal fortitude to call out behaviour which is not.

(3) **Professional.** Professionalism defines HALO's reputation. It is underpinned by our values and standards and involves the highest levels of competence and safety *and the relentless pursuit of excellence*, whether conceptual technical, or procedural. The agile application of lessons-learned is an essential component.

3. **Implementation and Compliance with HALO's Code of Conduct.** The 'Code' includes HALO's Values and Standards.

a. **Oversight and Application.** The Trustees, CEO and Directors have a responsibility for developing, overseeing and auditing compliance with HALO's Code of Conduct. The Code applies to anyone working with, or providing services for HALO (including partners, contractors, suppliers, external consultants and third-party representatives).

b. **Compliance Failures.** Any member of staff who breaches the Code will face disciplinary action, which could result in dismissal for gross misconduct; compliance is a contractual obligation. Partners, contractors, suppliers, or external consultants who are proven to be wilfully in contravention will have their contract terminated with immediate effect.

c. **Review.** From time to time it may be appropriate for the Code to be adjusted and it will be subject to annual Trustee Review (via the HALO Board's Governance and Nominating Committee).

d. **Raising a Concern.** All staff have a duty to ensure that we stick to our Values and Standards and abide by all the aspects of this Code. **Anyone concerned about any form of malpractice, improper action or wrongdoing must report it immediately.** HALO's **Whistleblowing Policy** refers and should be read in conjunction with the Code.

4. **Personal and Organisational Behaviours.**

² This includes the International Bill of Human Rights; the UN Global Compact; UN Guiding Principles on Business and Human Rights; the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work; ILO's Convention No. 138 on Minimum Age for Admission to Employment; and the Ethical Trading Initiative (ETI) Base Code.

a. **Sexual Exploitation and Abuse and Bullying and Harassment.** HALO does not in any way tolerate any form of abuse, or harassment and the Charity's **Safeguarding Policy refers.** Staff and partners must:

(1) Respect others, provide a safe environment for all staff, beneficiaries and occasionally volunteers (with an emphasis on children and the vulnerable) and report any abuse (or allegation of it). Proven abuse (of any kind) is gross misconduct and, where appropriate will result in dismissal and immediate referral of the case to law enforcement authorities.

(2) Harassment of any member of staff, or beneficiary (particularly unwanted physical contact), will result in disciplinary action. Such behaviour includes (but is not limited to) intimidation of any kind, or any action which belittles, makes fun of, or disadvantages anyone else.

(3) All staff are expected to report anything which they either know, or suspect, has exposed staff, or beneficiaries to any harm; **HALO's Whistleblowing Policy refers.**

b. **Radicalisation and Extremism.** Forcing one's own views on another person and expecting them to follow a creed, ideology or concept which is alien to HALO's work, or which in any way compromises humanitarian neutrality, is completely unacceptable and the antithesis of our Values and Standards. Every effort must be made to prevent and intercept any form of extremism and it must be immediately reported if suspected, or found. **HALO's Safeguarding and Whistleblowing Policies refer.**

c. **The Protection of Human Rights.**

(1) HALO has a significant role to play in furthering human rights in beneficiary communities; they should be upheld and respected in all circumstances; the UN Convention on the Rights of the Child (UNCRC) is of particular importance³. HALO will not tolerate any abuse of human rights in any part of the organisation, or its supply chain and partner organisations. Any allegations will be taken extremely seriously and will be subject to immediate investigation.

(2) Due diligence checks on partners, contractors and suppliers will identify whether there is a risk of human rights breaches. Concerns may prevent contract award and any evidence will result in the immediate termination of a contract and referral to the appropriate domestic and international law enforcement authorities.

(3) HALO reserves the right to terminate contracts where any of the following breaches are evident:

(a) the use of any forced labour, including prison labour, indentured labour, bonded labour, military labour, slave labour and any form of human trafficking;

(b) denial of the right to form or join a labour union, without fear of reprisal, intimidation, or harassment;

³ A legally binding international agreement setting out the civil, political, economic, social and cultural rights of every child regardless of race, religion, orientation, or abilities.

- (c) provision of a safe and healthy workplace with appropriate health and safety rules and regulations;
- (d) employment of children (under 18) for hazardous work;
- (e) failure to remunerate staff appropriately based on the local laws and labour market;
- (f) excessive working hours;
- (g) any discrimination in hiring, remuneration, access to training, promotion, termination or retirement. Discrimination could be based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation;
- (h) failure to employ staff in line with national labour laws.

(4) HALO is committed to engaging with stakeholders in our beneficiary communities to ensure that the Charity is listening to, learning from, and taking into account community views; all programmes must see such engagement as a standing priority. The Trustees will annually review and (where appropriate) report upon the steps HALO is taking to further the protection of human rights in beneficiary communities.

d. **Procurement.** HALO will always seek not to purchase any items from suppliers who do not conform to the ETI (Ethical Trading Initiative) Base Code. HALO's procurement approach is designed best to achieve that:

- (1) transactions entered into by HALO are economically viable and represent good value for money;
- (2) HALO will seek where possible to enter into agreements only with suppliers and contractors who share its commitment to upholding the highest ethical and quality standards;
- (3) transactions are fully audited and that the processes followed are consistent and transparent; and
- (4) transactions are approved at the appropriate level, commensurate with the value and profile of the transaction.

e. **Bribery, Corruption and Fraud.** HALO takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its financial dealings and relationships; **HALO's Anti-Fraud and Bribery Policy refers.** Fraud is deemed gross misconduct; allegations will be immediately investigated and disciplinary action will follow where an accusation is proven. Contractors, consultants, partners and third-party providers who are found to be fraudulent will have their contracts terminated with immediate effect.

f. **Gifts and Hospitality.** The giving, or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, reputation, or for furthering

HALO's charitable purposes, is permitted; **HALO's Gifts and Hospitality Code for Trustees and Senior Management refers.**

(1) A gift (which includes hospitality), will *not* be appropriate if it is unduly lavish or extravagant, or could be seen as an inducement, or reward for any preferential treatment (for example, during contractual negotiations or a tender process). Gifts of a value of more than £50 should not be accepted and permission must be sought from senior management before receipt of any gift; records must also be kept.

(2) Expenses claims for hospitality extended by HALO are to be recorded in accordance with our expense procedures.

g. **Conflicts of Interest.** HALO employees must not put themselves in a position where they are involved, either directly or indirectly, in an activity for personal gain (of any sort), which conflicts with HALO's interests; **HALO's Conflicts of Interest Policy refers.** Conflicts of interest can take many forms and they include, but are not limited to:

(1) engaging in any activity that competes with HALO;

(2) taking personal advantage of an opportunity that belongs to HALO;

(3) engaging in a business relationship on behalf of HALO where you, or a family member, have an interest in the other party, including a directorship or shareholding, unless previously notified to, and accepted/ agreed by senior management.

h. **Equality, Respect and Dignity.** HALO respects and treats everyone equally throughout their careers, regardless of age, gender, gender reassignment, colour, ethnic or national origin, disability, hours of work, nationality, religion or belief, marital or civil partner status, political opinions, or sexual orientation. **The Charity's Equality and Diversity Policy refers** and every employee has a responsibility to expose unfair behaviour of any kind.

i. **Confidentiality and Data Protection.**

(1) **Data.** HALO recognises the importance of respecting privacy and the need for appropriate safeguards in the collection, storage and processing of personal data. All information held about individuals must be dealt with properly and responsibly. Data must be handled appropriately in line with UK General Data Protection Regulations (GDPR) and host-nation laws and expectations. **HALO's Data Protection Policy refers.**

(2) **Confidentiality.** **HALO's Confidentiality and non-Disclosure Policy refers.** Confidential information in whatever form (including - without limitation - written, oral, visual or electronic information), which relates to HALO's property, operations, services, affairs, finances, grants, contracts, or staff safety and security, must be protected. Everyone in, or working for HALO, has a duty to protect *any* confidential information and must use their best endeavours to avoid inadvertent disclosure; deliberate disclosure will constitute gross misconduct. HALO staff must not:

(a) use any confidential information beyond the purpose for which it was collected; or

(b) make, or use, any copies of confidential information; or

- (c) disclose confidential information to any other person, or organisation without permission from senior management.

Staff must:

- (d) ensure all confidential information is respected and protected;
- (e) inform HALO HQ immediately on becoming aware, or suspecting, that any person or organisation has knowledge of, or has used, any of HALO's confidential information;
- (f) be prepared to hand over confidential information, delete it (if stored in electronic format) and provide a signed statement of compliance.

Nothing in this section prevents a HALO employee from making a protected disclosure within the meaning of section 43A of the Employment Rights Act 1996.

j. **Social Networking Sites.** HALO recognises that staff might use blogs or social networking sites, both in and outside of work. These sites can be useful and enjoyable, however information posted on them is public and may be viewed by others, including the press. We should therefore never post pejorative comments about HALO, its employees, or its beneficiaries, or indeed any other person; doing so is very likely to constitute gross-misconduct. All staff are responsible for their words and actions online and should always stop to consider whether a comment, photograph or video complies with our Values and Standards. This means not:

- (1) posting illegal, inappropriate, derogatory, discriminatory, threatening, defamatory, offensive or intimidating comments on blogs and/ or social networking sites;
- (2) making statements which are untrue, or misleading;
- (3) representing yourself (for example, impersonating another individual) or HALO in any false, or misleading way; and
- (4) participating in social media discussions when the topic being discussed might be considered sensitive (e.g. a crisis, intellectual property, reputational issues, commercially sensitive information, or topics and issues which could cause cultural sensitivity), without first seeking guidance from senior management.

5. HALO Property and Resources.

a. **Information Governance.** HALO handles information in accordance with its **Information Security Management policy** and complies with applicable legislation. 'Information' includes personal data, confidential material, and anything else of importance to the individual, or to HALO.

b. **Personal Data.** All staff are responsible for ensuring that personal information is handled in compliance with UK GDPR, host-nation laws and expectations and HALO's Information Security Management policy. This applies to all information held on a computer or in hard copy files, from which a person could be identified. All staff should:

(1) Beware of malevolent applications for information to which the individual requesting it is not entitled.

(2) Not use, or access, personal data without appropriate authorisation and only for legitimate legal, or business purposes, holding the information only as long as is necessary to carry out the business or legal task.

c. **Use of Information Technology (IT).** use of HALO's IT facilities is subject to HALO's Information Security policies and procedures which aim to protect IT equipment, systems, networks and information including smart phones and other hand-held devices. Using IT equipment inappropriately could result in compromise and such incidents will be subject to disciplinary action, which could lead to dismissal. HALO's IT must be cared for as if it was owned by the user.

d. **Innovation and Intellectual Property.** HALO owns any inventions, discoveries, improvements, brands and designs made by employees during the course of their employment and all related intellectual property rights (IPR). HALO will be entitled to the exclusive use of IPR, as far as the law permits. Employees will have no right to use IPR for their own purposes unless otherwise agreed by HALO in writing. Copyright (and similar rights) in work created during employment will also be owned by HALO; employees are required to waive any rights to use, or access, as an employment condition.

HALO's Code of Conduct is effective from (and was last reviewed on): 15 January 2020