

GLOBAL POLICY

VALUES

CONDUCT AND

WHISTLEBLOWING

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| Lead | PII Governance and Executive Department |
| Version Number | |
| Date of Approval by Members' Assembly | June 2018 |
| Effective Date (if different from above) | |
| Review Date (3 years from Effective Date) | June 2021 |

APPLICATION

As a Global Policy, this policy applies to:

- a. Plan International, Inc. (“PII”), including its headquarters in the United Kingdom (operating through its UK subsidiary, Plan Limited), and all of its country offices, regional offices, liaison offices, and any other offices, some of which operate as branches and some as subsidiaries;
- b. All National Organisations that have signed a Members’ Agreement and License Agreement with PII; and
- c. All other entities that agree to be bound by the Global Policies.

(together, “Plan International Entities”, also referred to in this document as “we” or “us”)

All of the entities that are bound by Global Policies, including PII, shall enact their own procedures regulations or other regulatory documents that enable compliance by its employees (and/or, when appropriate, contractors and other partners) with this Global Policy.

This Global Policy should be read and understood in conjunction with:

- a. relevant associated Policies, as may be amended from time to time, including but not limited to: Global Policy on Safeguarding Children and Young People; Global Policy on Anti-Fraud, Anti-Bribery and Corruption; Global Policy on Gender and Inclusion; and any entity-specific policies addressing harassment, bullying and discrimination, discipline and grievance issues; and
- b. local legislation (where possible), however should this Global Policy demand a higher standard of conduct than local laws then this Global Policy will prevail.

PURPOSE

The purpose of this Global Policy is:

1. To articulate the common values and behaviours approved by the Members’ Assembly and shared by all Plan International Entities;
2. To ensure that Staff and Volunteers treat each other and our beneficiaries with dignity and respect;
3. To ensure that all Plan International Entities provide a safe and inclusive workplace; and
4. To encourage Staff and Volunteers to report suspected wrongdoing or irregularities within Plan International Entities as soon as possible.

POLICY STATEMENT

Our work is based on deeply held values and a clear purpose. We will ensure that our shared values and behaviours become embedded in our culture and the guiding principles behind all our decision-making.

We frequently work in complex and insecure environments, and in situations where we are in positions of power and trust (in relation to the children, young people and beneficiary communities we work with, with other organisations and one another). We must under no circumstances abuse this power and trust.

We must ensure that representatives of Plan International Entities conduct themselves in a manner which is consistent with their role and commitment to our values both during and outside of working hours (whether inside or outside of the office environment) in accordance with this Global Policy. We have zero tolerance for, and will act appropriately in response to, any conduct or behaviour contrary to this Global Policy.

We encourage full disclosure of suspected or alleged breaches of the expected standards of conduct and will protect those who make such disclosures from suffering any adverse consequences.

APPLICABLE REQUIREMENTS

1. Our Values and Behaviours

Our shared values express the deepest-held beliefs of Plan International. They articulate our philosophy, desired culture and fundamental principles which should not to be compromised for financial gain or short-term expediency.

Each Plan International Entity adopts the following values, with the definitions outlined in the table below, and the associated leadership and staff behaviours. This will not preclude National Organisations from adopting additional values and behaviours that they consider are relevant to them locally, provided these are not inconsistent with the Values and Behaviours below:

| VALUES | <u>We strive for lasting impact</u> | <u>We are open and accountable</u> | <u>We work well together</u> | <u>We are inclusive and empowering</u> |
|-----------------------|--|--|---|---|
| DEFINITIONS | We strive to achieve significant and lasting impact on the lives of children and young people, and to secure equality for girls. We challenge ourselves to be bold, courageous, responsive, focused and innovative. | We create a climate of trust inside and outside the organisation by being open, honest and transparent. We hold ourselves and others to account for the decisions we make and for our impact on others, while doing what we say we will do. | We succeed by working effectively with others, inside and outside the organization, including our sponsors and donors. We actively support our colleagues, helping them to achieve their goals. We come together to create and implement solutions in our teams, across Plan International, with children, girls, young people, communities and our partners. | We respect all people, appreciate differences and challenge inequality in our programmes and our workplace. We support children, girls and young people to increase their confidence and to change their own lives. We empower our staff to give their best and develop their potential. |
| LEADERSHIP BEHAVIOURS | <ul style="list-style-type: none"> ▪ I articulate a clear purpose for staff and set high expectations for our work and its impact ▪ I create a climate of continuous improvement, open to challenge and new ideas ▪ I focus resources to drive change in practice and policy at local, national and global levels, to maximise our long-term impact, responding quickly to changing needs, new priorities or crises ▪ I use evidence from inside and outside the organisation to understand the root causes of issues, inform decisions and evaluate effectiveness | <ul style="list-style-type: none"> ▪ I practice and promote a culture of openness and transparency within my team and beyond, including with our sponsors and donors ▪ I hold myself and others accountable to achieve the highest standards of integrity, especially in our use of resources ▪ I am accountable for ensuring we are a safe organisation for all children, girls and young people ▪ I am consistent and fair in the way I treat other people. ▪ I expect myself and others to be open about mistakes and to learn from them | <ul style="list-style-type: none"> ▪ I seek constructive outcomes in discussions. I challenge assumptions but listen to others and I am willing to compromise when it is beneficial to progress ▪ I build constructive relationships across Plan International to support our shared goals to develop trusting and 'win-win' relationships with funders, partners and communities, creating solutions together to meet our goals and to support others in achieving theirs ▪ I engage and work with others outside the organisation to build a better world for girls and all children | <ul style="list-style-type: none"> ▪ I actively promote diversity, gender equality and inclusion, inside and outside of Plan International. ▪ I listen with humility to others and support those I work with to participate in decisions, to take more responsibility and to develop their potential ▪ I encourage a climate that empowers children and young people as agents of change in their own lives ▪ I will not tolerate any form of bullying, harassment or discrimination in the workplace |
| STAFF BEHAVIOURS | <ul style="list-style-type: none"> ▪ I have the courage to challenge the way we and others work, to make sure we all achieve the best results ▪ I take the initiative to find new and better ways of doing my work | <ul style="list-style-type: none"> ▪ I hold myself and others (inside and outside the organisation) to account for what we have agreed to do and the impact of our actions on others ▪ I am open, honest and transparent about my work | <ul style="list-style-type: none"> ▪ I offer information, experience and support to colleagues across Plan International and others to help us meet our shared goals ▪ I abide by agreed codes of conduct in my work with my team and others ▪ I develop improvements and solutions by working collaboratively with colleagues and others | <ul style="list-style-type: none"> ▪ I help to create an environment where children, young people, communities, partners and colleagues are supported and feel safe ▪ I respect and pay attention to each person's rights and needs ▪ I listen to others with humility and value their opinions, beliefs |

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| | <ul style="list-style-type: none"> ▪ I focus my effort where it will make the best contribution to Plan International's purpose and strategic goals ▪ I am flexible and change my ways of working when needed ▪ I seek and use information on the efficiency and effectiveness of my work to improve my contribution ▪ I persevere and encourage others to maintain a positive outlook in the face of setbacks and adversity | <ul style="list-style-type: none"> ▪ I am not afraid to admit mistakes; I try to put them right and do better next time ▪ I willingly share information to support effective decision making in my team and beyond ▪ I stand up and challenge others when I see wrong doing ▪ I am honest in how I use resources and do not waste them | <ul style="list-style-type: none"> ▪ I help colleagues in my team and others to tackle challenges and celebrate successes ▪ I ask for help when I need it, seeking and listening to feedback from others in order to learn and improve ▪ I value contributions from colleagues across Plan International | <p>and perspectives, challenging my own point of view</p> <ul style="list-style-type: none"> ▪ I confront and challenge both direct and indirect forms of discrimination, gender inequality, bullying and harassment ▪ I encourage those I work with to influence decisions and develop themselves ▪ Where appropriate I involve children and young people in the decisions that affect them |

2. Standards of Conduct

Each Plan International Entity shall adopt the standards of conduct for its Staff reflected in the Code of Conduct in Appendix 1. National Organisations may adopt an entity-specific Code of Conduct that includes standards of behaviour that they consider to be locally relevant to them, provided that such entity-specific Code of Conduct establishes standards of conduct equivalent to, or higher than, the Code of Conduct in Appendix 1.

Each Plan International Entity shall ensure that Staff and Volunteers indicate their agreement to comply with the relevant standards of conduct by signing a copy of the applicable Code of Conduct. Plan International Entities shall, in their discretion, determine how the applicable Code of Conduct is embedded within their organisation including how often Staff and Volunteers are required to re-sign the Code as a reminder of its content.

3. Whistleblowing

Each Plan International Entity shall take appropriate measures to implement this Global Policy in order to encourage and enable Whistleblowers to report Whistleblowing Concerns as soon as possible in the knowledge that they are able to do so without fear of intimidation, harassment, retaliation, reprisals, discrimination, or adverse employment consequence because of such report.

All Plan International Entities shall establish appropriate Whistleblowing procedures, which shall provide, at a minimum:

- a. Guidance to Whistleblowers on how to report Whistleblowing Concerns, including reassurance that their confidentiality and, if desired, anonymity will be respected to the extent permitted by law;
- b. The prompt and proper investigation of all Whistleblowing Concerns to a consistent standard;
- c. A means for responses to recommendations made in Whistleblowing investigation reports;
- d. A system for reporting to the appropriate governing body details of Whistleblowing investigations affecting the relevant Plan International Entity, including provision of a summary report of all reported Whistleblowing Concerns to the PII Director of Global Assurance (reporting to the International Board) on a regular basis; and
- e. The retention of all records of reported Whistleblowing Concerns and Whistleblowing investigations on a strictly confidential basis for the required periods under the relevant entity-specific document retention policies.

ROLES AND RESPONSIBILITIES

1. All Staff and Volunteers shall:

- a. Agree, by signing, to comply with either the Code of Conduct (Appendix 1) or an entity-specific code of conduct consistent with this Global Policy.
- b. Report any Whistleblowing Concerns they may have in accordance with the relevant entity-specific procedure.
- c. Assist in any investigations of Whistleblowing Concerns in accordance with the relevant entity-specific procedure by making available all relevant information and by cooperating in interviews.

2. Managers shall ensure that:

- a. This Global Policy is fully embedded within their areas of responsibility to create an environment in which our Values and Behaviours form the basis of all our actions.

- b. They support systems that make clear the type of conduct that is encouraged and the conduct that will never be acceptable in accordance with the Code of Conduct in Appendix 1 or equivalent, for which they will implement appropriate sanctions.
- c. Children, young people and communities with which we engage, work or are in contact are made aware of the provisions of this Global Policy to ensure they have the confidence and ability to report any suspected breaches of their standards of conduct.
- d. Staff and Volunteers are aware of the protections available in respect of disclosures of Whistleblowing Concerns made in accordance with this Global Policy.

3. Directors shall ensure that:

- a. The relevant Plan International Entity has in place local policies and procedures that are consistent with this Global Policy and aid its implementation.
- b. Staff and Volunteers are made explicitly aware of this Global Policy and their responsibilities hereunder, including by direct distribution, access on shared intranet systems, visibility in conspicuous office locations, and through training and as part of the induction process.
- c. The relevant Plan International Entity monitors its compliance with this Global Policy.

4. The PII Director of Global Assurance shall provide a summary of reported Whistleblowing Concerns to the International Board on a regular basis.

TERMS AND DEFINITIONS

When used in this document:

“Director” is an Executive Director of PII or a National Director, Country Director or Regional Director and Sub-Regional Director.

“Manager” refers to a Staff member who has responsibility for line managing or supervising the work of Staff or Volunteers.

“Staff” refers to individuals whose relationship with a Plan International Entity is governed by an employment contract.

“Volunteer” refers to non-paid individuals who have committed to work with or support a Plan International Entity, or who are otherwise affiliated with a Plan International Entity such that they could objectively be seen as a representative of the organisation. It includes, among others, board members, volunteers (including community volunteers), and interns.

“Whistleblowing” is the disclosure of information which relates to potential or suspected unethical and/or illegal conduct or activity, irregularities, wrongdoing or dangers at work. This may include (but is not limited to):

- a. Breach of our internal policies and procedures, including (but not limited to):
 - i. this Global Policy;
 - ii. the Global Policy on Anti-Fraud, Anti-Bribery and Corruption;
 - iii. the Global Policy on Safeguarding Children and Young People;
 - iv. the Global Policy on Gender and Inclusion; and

- v. Entity-specific policies addressing harassment, bullying and discrimination;
- b. Criminal offences or breach of civil law or regulations;
- c. Endangerment of the health or safety of any person;
- d. Conduct likely to damage the reputation or financial well-being of any Plan International Entity;
- e. The deliberate concealment of any of the above.

A “Whistleblower” is a person who raises a genuine concern relating to any of the above (each a “Whistleblowing Concern”) that they reasonably believe to be true.

APPENDIX 1 CODE OF CONDUCT

1. I will conduct myself in line with the following Values and Behaviours as appropriate to my role:

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2. I will respect others:

I will:

- a. Respect the rights of all people without discrimination.
- b. Always act fairly and honestly and will treat people with dignity and respect.
- c. Be aware of what constitutes harassment, bullying and discrimination and the damage it can do to individuals and to Plan International, and comply with all applicable policies and standards that contribute to building a workplace environment free from harassment, bullying and discrimination.

I will not:

- d. Take part in any form of discrimination, harassment, or abuse (physical, sexual or verbal), intimidation or exploitation, or in any other way infringe the rights of others.

3. I will work actively to safeguard the rights of children and young people:

I will:

- a. Adhere to the Global Policy on Safeguarding Children and Young People including the Safeguarding Code of Conduct, which can be found at Annex A to this Code.

4. I will maintain high standards of personal and professional conduct while working for [*insert Plan International Entity*]:

I will:

- a. Ensure that my behaviour does not jeopardise our political and religious neutrality.
- b. Be open and honest in dealings with Plan International, its beneficiaries and their communities, and Plan International's partners, donors and other associates.
- c. Declare any serious criminal convictions (punishable by custodial sentence or more serious penalty) against me.
- d. Adhere to any professional code of conduct applicable to my role and profession.
- e. Make proper use of Plan International's resources and take all reasonable steps to protect them from theft, fraud or other damage.
- f. Seek to ensure that my conduct does not bring Plan International into disrepute.

I will not:

- g. Pursue personal or family gain or advantage in my dealings with or on behalf of Plan International.
- h. Accept bribes, significant gifts,¹ favours of financial value or other services offered as a result of my employment with [*insert Plan International Entity*] or in respect of our help, goods, or services of any kind.
- i. Enter into any business relationship on behalf of Plan International without authorization from my line manager and/or any relevant procurement policy.
- j. Behave in a way which creates unnecessary risk to my security or the security of others.
- k. Use any substances (alcohol or otherwise) in a way that adversely affects my ability to do my job or affects Plan International's reputation.
- l. Possess or profit from the sale of illegal goods or substances.
- m. Use Plan International's computer equipment, mobile phones, video and digital cameras or other equipment to view, download, create or distribute inappropriate

¹ Significant gifts do not include small tokens of appreciation. You should notify your line manager if you are offered or receive gifts of any kind.

material, including but not limited to material which is pornographic, defamatory, abusive, sexist, racist or otherwise exploitative.

- n. Exchange money, employment, goods or services for sex, including sexual favours or any other forms of humiliating, degrading, or exploitative behaviour.
- o. Release any private or confidential information relating to Plan International or its Staff, Volunteers or beneficiaries to others unless it is a requirement of my job or I am legally required to do so.

5. I will report any concern or incident relating to this Code of Conduct where I develop concerns or suspicions regarding breaches of this Code.

I will:

- a. Report any matter which appears to breach the standards contained in the Code of Conduct or associated Policies that I witness or I am made aware of to the appropriate management or other party, using the relevant procedures within my office.
- b. Support any investigation into suspected, alleged or known breaches of this Code or Plan International's associated Policies, including as a witness.

I will not:

- c. Withhold any relevant information.
- d. Undertake any action on my own that is not in line with local policies and procedures and/or, without guidance from relevant focal points and managers.

6. Implementation and Monitoring

The Chief Executive Officer of PII / National Director (depending on location) is responsible for ensuring the implementation and monitoring of this Code of Conduct.

Failure to adhere to this Code of Conduct and the standards of behaviour it promotes and requires could result in disciplinary action (including, potentially, your dismissal or termination of all relations with any Plan International Entity including contractual and partnership agreements). In some cases the matter may be so serious that Plan International may choose (and in some cases be obliged) to report to any relevant professional government or law enforcement authorities which may decide to launch a criminal prosecution.

[Insert Plan International Entity] will:

- Take all concerns and reports seriously at all levels.
- Investigate and act on reports immediately.
- Take appropriate legal or other action against anyone making a false and/or malicious accusation.

ANNEX A: SAFEGUARDING CHILDREN AND YOUNG PEOPLE CODE OF CONDUCT

Plan International is committed to creating a safe environment for children and young people. All staff have a duty to uphold the principles of the Global Policy on Safeguarding Children and Young People and commit to maintaining an environment that prevents violence against children and young people. Further to this sexual exploitation and abuse by staff (including those that work in our humanitarian response) constitutes acts of gross misconduct is therefore grounds for termination of employment.

As such, I agree that I will:

- a. Adhere to the Global Policy on Safeguarding Children and Young People and be open and honest in my dealings with children and young people, their families, and communities participating in programmes, projects, processes, events, and activities.
- b. Treat children and young people in a manner which is respectful of their rights, integrity, and dignity and considers their best interests regardless of age, sex, gender, gender identity, sexual orientation, nationality, ethnic origin, colour, race, language, religious or political beliefs, marital status, disability, physical or mental health, family, socio-economic or cultural background, class, or any history of conflict with the law.
- c. Comply with all relevant international standards and local legislation in relation to child labour, and refrain from using children and young people aged below 18 years for domestic or other labour, if such work is inappropriate, exploitative or harmful given their age or developmental capacity, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury, exploitation, or violence. In addition, I understand that I must not use children and young people of any age that we work with for domestic or other labour.
- d. Contribute to building an environment where children and young people we engage with are:
 - i. respected and empowered to participate in and discuss decision making and interventions into their safeguarding in accordance with their age, maturity and evolving capacities; and
 - ii. well informed on their safeguarding and protection rights and what to do if they have a concern.
- e. Create and maintain an environment which prevents the abuse and exploitation of children and young people ensuring that I am aware of potential risks with regards to my conduct and work, and take appropriate action so as to minimise risks to children and young people.
- f. Respect the privacy and confidentiality of children and young people associated with Plan International. This means I will:
 - Never ask for or accept personal contact details or invitations to share personal contact details (this includes email, phone numbers, social media contacts, address, webcam, skype, etc.) from any child or family associated or formerly associated² with our work or share my own personal contact details with such individuals except where this has been explicitly authorised by Plan International and/or for Plan International business purposes.³
 - Never disclose, or support the disclosure of, information that identifies sponsored families or children, through any medium, unless that disclosure is in accordance with standard Plan International policies and procedures and/or has the explicit consent of Plan International.⁴Media include paper, photographs, and social media.

² Where the child is a sponsored child requests for continued communication upon 'graduation' of the sponsorship (when the sponsored child reaches 18 years) must comply with Plan International's Sponsorship guidelines on the same.

³ Plan International will seek informed consent as appropriate from the child or young person.

⁴ Plan International will seek informed consent as appropriate from the child or young person

- Never make any contact with a child, young person, or family members associated with Plan International's work that is not supervised by a (or another) member of Plan International Staff. Such contact may include but is not limited to visits and any form of communication via social media, emails, and letters.
- Always ensure that when on an official or work visit with Plan International and I wish to take pictures of children and young people associated with the organisation, for personal use, I will:
 - Always consult first with the local Plan International office so as to make sure that it is ok to take pictures in the local context and that the intended use of the pictures does not conflict with Plan International's policies.
 - Ask permission of the child or young person (or in the case of young children, their parent or guardian) informing them of the specific purpose(s) and intended use (including how and where) and respect their decision to say no making it clear that there will be absolutely no negative repercussions from denying such consent.
 - Ensure the images are respectful and do not impact negatively on their dignity and privacy.
 - Ensure that the use of the images does not put the child or young person at risk of being identified or located.
 - Never upload the images of children and young people associated with Plan International to non-Plan International social media pages without the full and explicit consent of Plan International⁵.
- g. Report and respond to any concerns, suspicions, incidents or allegations of actual or potential abuse to a child or young person in accordance with applicable procedures of the engaging office.
- h. Cooperate fully and confidentially in any Plan International investigation of concerns or allegations of abuse to children and young people.
- i. Immediately disclose all charges, convictions, and other outcomes of an offence, which occurred before or occurs during association with Plan International that relate to exploitation and abuse of a child or young person.

I will not:

- a. Abuse or exploit a child or young person or behave in any way that places a child or young person at risk of harm, including through harmful traditional practices such as, for example, Female Genital Mutilation, forced or child marriage.
- b. Engage in any form of sexual activity or develop physical/sexual relationships with anyone under the age of 18 regardless of the age of consent locally. Mistaken belief in the age of a child is not a defence.⁶
- c. Engage in sexual relationships with Plan International youth direct beneficiaries aged 18 to 24 years as these undermine the credibility and integrity of Plan International's work and are based on inherently unequal power dynamics'.⁷
- d. Use physical punishment/discipline or use of physical force of any kind towards children and young people.
- e. Engage young people in any form of sexual activity which involves the exchange money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. This includes exchange of assistance that is due to beneficiaries⁸

⁵ Plan International will seek informed consent as appropriate from the child or young person and parents or guardians where applicable.

⁶ ST/SGB/2003/13: UN Secretary-General's Bulletin on Special measures for protection from sexual exploitation and sexual abuse, 2003 (endorsed by Plan International).

⁷ We recognise that our incentive Workers and Community Volunteers live in communities where we operate and so on rare occasions, relationships may develop that may be seen as acceptable in the community but would breach this element of the code. However, we expect Incentive Workers and Community Volunteers working in Programme areas to make known to the relevant manager any potentially compromising relationship they are in or considering, that involve a beneficiary who is aged 18 years and above.

⁸ Ibid.

- f. Use language or behave towards a child or young person in a way that is inappropriate, offensive, abusive, sexually provocative, demeaning or culturally inappropriate.
- g. Fondle, hold, kiss, hug or touch children or young people in an inappropriate or culturally insensitive way.
- h. Have a child/children/young person with whom I am in contact in a work related context, stay overnight at my home or any other personal residential location or accommodation.
- i. Sleep in the same room or bed as a child or young person with whom I am in contact in a work related context. Where it is necessary to sleep close to unaccompanied children and young people, I will make sure that another adult is present and it is in line with authorized procedures.
- j. Do things of a personal nature for children or young person, with whom I am in contact in a work related context, (e.g. taking a child/young person to the toilet/bathroom; helping them get un/dressed etc.) that they can do for themselves.
- k. Spend time alone away from others with children and young people with whom I am in contact in a work related context; I will always make sure that another adult is with me and/or I am with the child/young person in an open public place, where others are around and in plain view of others.
- l. Hit or otherwise physically assault or physically abuse children or young people.
- m. Act in ways that shame, humiliate, belittle or degrade children and young people, or otherwise perpetrate any form of emotional abuse.
- n. Discriminate against, show differential or preferential to, or favour particular children and young people to the detriment of them or others.
- o. Develop relationships with, engage in any practice with or develop behaviour towards children and young people which could in any way be deemed or interpreted as exploitive or abusive.
- p. Condone or participate in behaviour of children or young people which is illegal, unsafe, or abusive.
- q. Use any computers, mobile phones, video and digital cameras, or any such medium to exploit, harass or bully children or young people.
- r. Use computers, mobile phones, or video/digital cameras or other electronic devices, to access, view, create, download, or distribute pornography, especially abusive images of children or young people.

The above is not an exhaustive list. Staff and Volunteers should consider all related actions and behaviour which may compromise the rights and safeguarding of children and young people.

Personal Conduct outside Work or Engagement with Us

We do not dictate the belief and value systems by which Staff and Volunteers conduct their personal lives. However, actions taken by them out of working hours that are seen to contradict this policy will be considered a violation of the policy.