



MAF International

Code of Conduct

Version 3 – July 2020



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1. Introduction

MAFI International (MAFI) is a UK based international organisation that connects its Christian identity with practical action, through our core values of Impact, Witness, Excellence, Partnership, Stewardship and Care. MAFI provides aviation and other technologies service to partner organisations and beneficiaries, in remote locations. The aim of MAFI is to reach those in the most isolated communities so that their lives may be transformed physically and spiritually in Christ's name.

A Code of Conduct is a key tool for the prevention of misconduct including harassment, exploitation and other inappropriate behaviour by staff towards beneficiaries, clients, staff or other people. The MAFI Code of Conduct describes acceptable standards of behaviour for staff as well as procedures in the event of a breach of the Code. It also promotes best practice which may be relied upon by external stakeholders.

As part of pre-employment induction all new staff members must read the MAFI Code of Conduct and sign it to confirm that they have understood its content and agree to conduct themselves accordingly. The Code will need to be re-read and re-signed on a biennial basis by all MAFI staff members.

Definitions for terminology used in this Code are given in section 3.

2. MAF International Code of Conduct

All MAFI staff (see definition of 'staff' at section 3) have a responsibility to conduct their work in accordance with MAFI's purpose, vision and core values as well as adhere to all policies and standards set out in our organisational manuals. All MAFI staff must comply with this MAFI Code of Conduct and refrain from acts of misconduct at all times, whether on or off duty.

2.1. Scope

This Code applies to staff including in relation to their visitors (also defined at Section 3). Staff have a responsibility to make visitors aware of the standards of conduct required under this Code and that those standards will apply to visitors while on MAFI property or while participating in MAFI activities.

Staff are engaged by MAFI in a variety of capacities and from various countries and cultures. By accepting employment, all staff assume the organisation's purpose, vision and core values as part of their responsibilities.

Managers at all levels have a particular responsibility to support and develop systems which maintain a safe environment for staff to uphold the standards of behaviour as stated in this Code of Conduct, including setting positive examples themselves.

The responsibility for implementation and monitoring of the Code of Conduct lies corporately with the CEO and ELT, and locally with each country director and their management team. This Code will be reviewed every 2 years and amended after broad consultation within the organisation.

2.2. Expected Behaviour and Prohibited Conduct

MAFI staff are expected to maintain the highest standard of conduct. All staff are responsible for their own behaviour and are obliged to ensure and maintain, to the extent that it depends on them, an environment that prevents bad practice and promotes best practice. MAFI staff must not engage, either directly or indirectly, in any form of misconduct. This section sets out general categories of expected behaviour and specifies examples of acts MAFI considers to be

misconduct or gross misconduct depending on the severity of the act. Nothing in the examples given below limits or otherwise varies the definitions given in section 3. MAFI expects the following conduct of its staff:

- a. **We treat beneficiaries equally:** When responding to those in need our staff members will not discriminate based on race, ethnicity, class, age, gender, gender identity, family status, marital status, disability, poverty, political convictions, religion or sexual orientation, or for any other reason. We proactively seek to improve the welfare of all our beneficiaries.

- b. **We protect vulnerable groups:** our staff members will do their utmost to protect all vulnerable groups against harassment, exploitation, and abuse or threat of abuse. We strongly reject any abuse or misuse of power including but not limited to:
 - Any form of violence such as violence that may accompany: bullying, verbal, physical or sexual harassment, rape, exploitation, intimidation and victimisation;
 - Behaviour that shows a lack of respect for the dignity of others including unlawful breach of confidentiality;
 - Reckless behaviour which leads to, or could potentially lead to injury or harm to people or property;
 - Fraud or any attempt to commit fraud or to accept, offer or solicit a bribe;
 - Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading, compromising or exploitative behaviour.
 - Withholding goods or services that are due to beneficiaries or clients, or awarding goods or services that are not due to beneficiaries or clients in order to obtain gifts, payment for sexual favour from them, or accepting gifts, goods, or services so that others may act in an abusive manner.

Any such abuses or misuses of power as set out above will be considered acts of gross misconduct and may result in dismissal.

- c. **We avoid conflict of interest:** our staff members must not use their position for personal gain. This includes not accepting or soliciting any gift, favour, loan or anything of monetary value from/to suppliers or potential suppliers.
 - MAFI is committed to conducting its activities with the highest degree of integrity and in full compliance with all applicable laws.
 - This commitment includes zero tolerance towards all forms of fraud, bribery, corruption and theft. This includes paying or receiving a bribe whether directly or indirectly as well as facilitation payments.
 - MAFI staff must not contribute to political organisations or individuals to obtain an advantage. Staff should conduct themselves at all times in a manner that avoids suspicion of such behaviour.
 - All staff should avoid situations in which their personal interest may conflict, or appear to conflict, with the interests of MAFI or its beneficiaries or clients.
 - When an employee suspects that a conflict of interest exists, they shall disclose this immediately to their Country Director or Support Department Manager so that action can be taken to avoid the conflict and/or manage it if is unavoidable. Managers should also keep an eye on potential conflicts of interests of their staff.

- d. **Use of digital media:** our staff members must not intentionally visit internet sites or chat rooms whose content is illegal or pornographic, racist, discriminatory or abusive. Staff must not create, distribute, download, stream or view illegal digital material.
- e. **Alcohol:** It is a disciplinary offence to come to, or to be at, work intoxicated by alcohol. Criminal convictions (including unrecorded convictions) of staff on alcohol-related charges will result in disciplinary action up to and including dismissal.
- f. **Illegal drugs:** our staff members must not distribute, sell, be in possession of or under the influence of illegal drugs at work. Distributing, selling, possessing and being under the influence of drugs at work, which are not medically prescribed (other than over the counter medication), is a disciplinary offence. Criminal convictions (including unrecorded convictions) of staff on drug related charges will result in disciplinary action, up to and including dismissal.
- g. **Prostitution:** our staff members must not engage in prostitution (including aiding and abetting) through either solicitation or purchase. Such behaviour is considered a disciplinary offence and will result in disciplinary action up to and including dismissal.
- h. **Duty to report:** our staff members will report all actual or suspected breaches of the MAFI Code of Conduct immediately in accordance with section 2.4.
- i. **Bringing MAF into disrepute:** our staff must not engage in conduct or behaviour, including the use of social media, that brings or could reasonably be expected to bring MAF into disrepute, harm MAF's reputation or public or regulatory standing.

2.3. Minimum Standards for the Protection of all Vulnerable Groups against Sexual Abuse and Exploitation

MAFI recognises that all staff, beneficiaries and clients have a right to be treated with dignity and respect. MAFI staff have a particular duty of care towards vulnerable groups. Therefore, any proven instances of harassment, exploitation, abuse or threat of abuse involving vulnerable groups will be treated as gross misconduct and, as such, will result in appropriate disciplinary action being taken, up to and including dismissal and reporting to local law enforcement agencies.

MAFI staff shall adhere to the following principles:

- a. Sexual exploitation and abuse by staff constitutes gross misconduct and is therefore grounds for termination of employment.
- b. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief of the age of a child is not a defence. Exceptions for local employees who, due to local customs, are married at a younger age will be considered on a case-by-case basis after seeking input from local leaders and authorities.
- c. Exchange of money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited;
- d. Sexual relationships between staff and beneficiaries (who are not married to each other) will be considered gross misconduct with zero tolerance. Such relationships, outside of marriage, undermine MAF's credibility and the integrity of humanitarian aid work.

- e. Where a staff member develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same organisation or not, s/he must report such concern as outlined in section 2.4.
- f. MAFI staff are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of our code of conduct. Managers at all levels have a particular responsibility to support and develop systems which maintain this environment.

If and when such cases concerning sexual abuse or exploitation arise, we are committed to ensure that breaches of these standards are immediately reported. MAFI has a legal and moral obligation to report this misconduct to the appropriate authorities and partners.

2.4. Duty to Report

It is the duty of all staff who become aware of any breach of this Code to report it immediately to a line manager, either through the established reporting mechanism (see section 2.5 below) or, if not appropriate, to senior management. Failure to report concerns of sexual abuse and exploitation will constitute misconduct and may be considered grounds for disciplinary measures.

Management must ensure that all information regarding breaches of this Code is handled with the utmost discretion. Any concerns or suspicions about a suspected incident of misconduct involving beneficiaries, clients or staff, whether major or minor, must be properly investigated and documented and appropriate action taken.

No action will be taken against a staff member reporting concerns where there are reasonable grounds to suspect the report is true. Disciplinary measures will be taken against staff for retaliating against a colleague who reports concerns or cooperates with an investigation. Disciplinary measures will also be taken for maliciously and falsely reporting misconduct, and for not cooperating with an investigation.

2.5. Reporting Procedure

Staff can use MAFI's Grievance Procedure or Whistle-Blowing Policy to report any breach of the Code of Conduct. The Grievance Procedure can be found in the relevant staff handbook and the Whistle-Blowing Policy in the *Organisational Manual*.

2.6. Consequences of Engaging in Misconduct

Misconduct will lead to disciplinary measures, which could lead to dismissal. If a claim is substantiated against MAFI staff, the organisation at its discretion may:

- a. Issue a written warning and/or place the staff member on probation;
- b. Demote the staff member;
- c. Terminate the employment contract with immediate effect in accordance with the applicable law;
- d. Take any other action as appropriate including reporting to local law enforcement agencies.

If the claim is not substantiated after investigation the staff member's record will be cleared.

2.7. Review of the Code of Conduct

MAFI recognises that both internal and external environments change. Such change may have a bearing on the scope and content of this policy. Consequently, it will be reviewed periodically. The review process will be consultative and participatory in nature. The responsibility for initiating the policy review process rests with MAFI's International Management Team (Executive Leadership Team with Country Directors).

ANY BREACH OF THIS CODE WILL RESULT IN DISCIPLINARY ACTION UP TO AND INCLUDING DISMISSAL

3. Clarification of Terminology

3.1. Definitions

Clear definitions are essential to ensure that the proper reporting of, and responses to instances of abuse or exploitation can be handled in a consistent manner. This section provides definitions for terms used in this Code. Staff are also bound by the local laws of the countries in which they work.

Table 1

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| Beneficiaries | A person or organisation who is from time to time the focus of MAF's aid work or who takes the benefit of that work. |
| Bullying | <p>Bullying is repeated inappropriate behaviour, direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, which could reasonably be regarded as undermining the individual's right to dignity. Examples of bullying are as follows:</p> <ul style="list-style-type: none"> • Manipulation of the victim's reputation by rumour, gossip or ridicule. • Preventing the victim from speaking by making loud voiced criticisms or obscenities. • Social exclusion or isolation. • Manipulating the nature of the work or the ability of the victim to perform the work e.g. by overloading, withholding information or setting meaningless tasks. • Physical or verbal abuse or threats of abuse. |
| Bribery | Offering, promising, giving, accepting or soliciting money, a gift or other advantages as an inducement to do something that is illegal or a breach of trust in the course of carrying out an organisation's activity. |
| Child | Persons under the age of 18 years. |
| Clients | A person or organisation (other than a beneficiary) who from time to time engages the services of MAFI in order to deliver external outcomes over which MAFI has no control or responsibility. |
| Conflict of interest | A situation in which a person or organisation is involved in multiple interests, financial or otherwise, and serving one interest could involve working against another. Also where the aims of two different parties are incompatible; and/or a situation in which a person is in a position to derive personal benefit from actions or decisions made in their official capacity. |
| Corruption | The abuse or misuse of entrusted power for private gain. |
| Exploitation | <p>Using one's position of authority, influence or control over resources, to pressure, force or manipulate someone to do something against their will. This includes threatening to withhold assistance, threatening to make false claims about a person in public, or any other negative repercussions in the work place or community. Examples of exploitation can include:</p> <ul style="list-style-type: none"> • Offering special benefits to beneficiaries, clients or staff in exchange for expressed, implied or demanded (sexual) favours. • Threats or insinuations that an individual's refusal or unwillingness to submit to demands will affect the person's entitlement to help and support, or terms and conditions of employment. |

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| Facilitation payment | A small bribe also called a 'facilitating', 'speed' or 'grease' payment; made privately to secure or expedite the performance of a routine or necessary action to which the payer has legal or other entitlement. |
| Fraud | Intentional deception designed to bring about financial or other material gain. |
| Gross Misconduct | Misconduct involving malicious intent or misconduct involving very serious negligent or reckless behaviour. |
| Harassment | <p>Any act or conduct including spoken words, gestures or the production, display or circulation of written words, pictures or other material, if the action or conduct is unwelcome to the recipient and could reasonably be regarded as offensive, humiliating or intimidating. Examples of harassment include:</p> <ul style="list-style-type: none"> • Verbal harassment, jokes, comments, ridicule, or songs • Physical harassment including jostling, shoving, or any form of assault; • Intimidatory harassment including gestures, posturing, or threatening poses; • Visual display such as posters, emblems, or badges; • Isolation or exclusion from social activities; • Pressure to behave in a manner that the staff, beneficiary or client says is inappropriate - for example, being required to dress in a manner unsuited to a person's ethnic or religious background. |
| Intimidation | Intentional behaviour that "would cause a person of ordinary sensibilities" to fear injury or harm. To frighten or threaten someone, in order to persuade them to do something or refrain from doing something. |
| Misconduct | Conduct that comprises one or more elements within this table (Table 1) |
| Rape or Attempted Rape | <p>An act of non-consensual sexual intercourse. Any non-consensual penetration is considered rape, and may include:</p> <ul style="list-style-type: none"> • Statutory rape – sexual intercourse with a person under the age of consent, even if the person agrees to the act. • Gang rape - rape by more than one assailant. • Male rape - the victim and perpetrator are both male. This is sometimes known as sodomy. • Attempted Rape: Efforts to rape someone falling short of penetration. |
| Sexual harassment | <p>Defined as any unwanted or inappropriate:</p> <ul style="list-style-type: none"> • Act of physical intimacy • Request for sexual favours • Other act or conduct including spoken words, gestures, or the production, display or circulation of written words, pictures or other material that is unwelcome and could reasonably be regarded as sexually offensive, humiliating or intimidating. <p>Examples of sexual harassment can include:</p> <ul style="list-style-type: none"> • <i>Verbal abuse</i>: requests or demands for sexual favours, suggestive remarks, degrading abuse or insults, jokes or tricks of a sexual nature. • <i>Physical abuse</i>: gesturing of a sexual nature, unnecessary touching, indecent exposure, and assault. • <i>Visual abuse</i>: displaying/circulating pornographic materials. |

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| | A single incident may constitute sexual harassment. Instances of sexual harassment will be treated as gross misconduct and may result in dismissal. |
| Staff | Employees, secondees, volunteers, consultants, board of trustees, contractors and other agents of MAFI whose agency is capable of recognition by law. |
| Theft (or stealing) | Is broadly defined in this Code to include: <ul style="list-style-type: none"> • Taking money or possessions that belongs to MAFI or any other organisation or person without permission and with an intention to deliberately and permanently deprive the owner of the money or possessions; • Unauthorised use of and/or possession of MAFI property – or of the property of a third party while acting or purporting to act on behalf of MAFI; • Serious negligence or deliberate misuse of MAFI property; • Any attempt to steal or misuse MAFI or other organisations’ or people’s property. |
| Victimisation | The act of singling out someone for cruel or unjust treatment with the intent to do physical or psychological harm. This may be an act of retribution, discrimination or an abuse of power. |
| Violence | Violence constitutes incidents where persons are abused, threatened or assaulted, involving an explicit or implicit challenge to their safety, health or wellbeing. |
| Visitor | People visiting MAFI workplaces and other places for work purposes. |
| Vulnerable Groups | People with whom MAFI operations come into contact who have been or are typically exposed to elevated levels of illness, poverty, persecution, predatory behaviour by others, violence including State sanctioned violence and natural disasters. |

3.2. Abbreviations

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| CEO | Chief Executive Officer |
| ELT | Executive Leadership Team |
| HR | Human Resources |

4. Agreement

I have read the above MAFI Code of Conduct, understand its contents and agree to fully comply with and be bound by it for the duration of my employment/secondment/volunteer work/international staff spouse/international staff adult dependent [*circle applicable term*] with MAFI.

Name _____

Date _____

Signature _____