

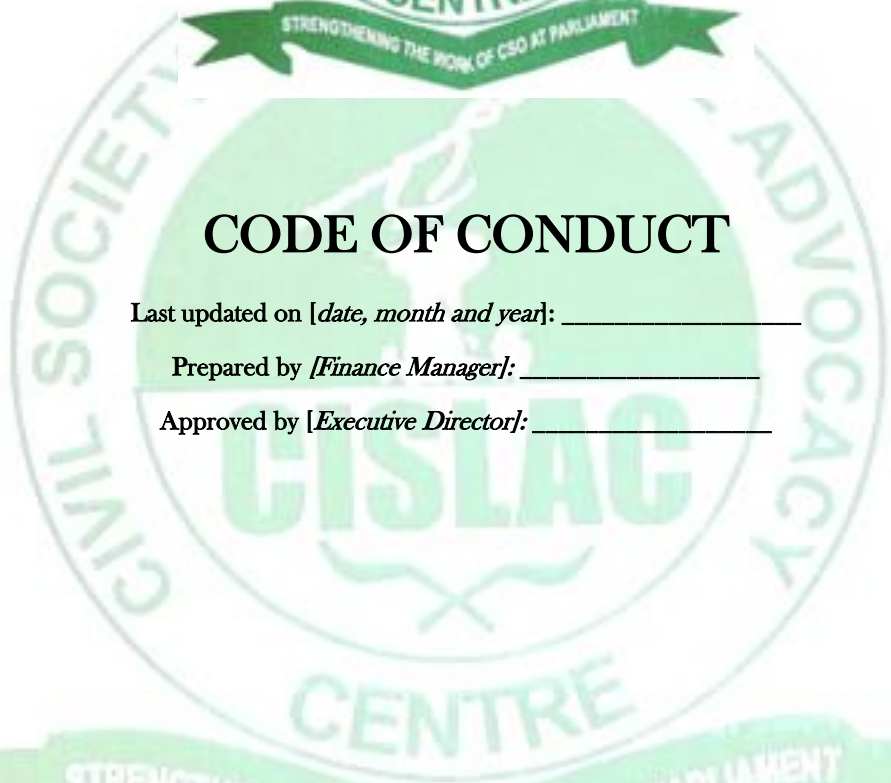


CODE OF CONDUCT

Last updated on [*date, month and year*]: _____

Prepared by [*Finance Manager*]: _____

Approved by [*Executive Director*]: _____



1. Introduction

Purpose of the Code of Conduct

Civil Society Legislative Advocacy Centre (CISLAC) is non-governmental, nonprofit legislative advocacy, information sharing and research organization, arising from the felt need to address defects in the legislative advocacy work of civil society and open the window through which legislators can also access civil society groups. Incorporated as a corporate body (CAC/IT/NO22738) with the Nigeria's Corporate Affairs Commission (CAC) on the 28th December 2006. She aims at strengthening the work of Civil Society on Legislative Advocacy and bridge the gap between legislators and the Civil Society. This has placed us currently as one of the major civil society organizations in Nigeria with a primary focus on legislation and legislative processes. CISLAC's outlined vision is a "Nigeria where legislators and policy makers are safeguarding citizens' rights and welfare while citizens effectively demand accountability". The corresponding mission is "to engage state and non-state actors for improved policy and legislative frameworks, transparency and accountability in governance for people-oriented development". The strategic goal for CISLAC in 2018-2023 is "to make government accessible, responsive and accountable to citizens". To achieve this goal, our strategic plan identifies six strategic axes within CISLAC portfolio.

The main purpose of the CISLAC Code of Conduct is to outline the key responsibilities of employees and representatives in relation to the protection and respect of the welfare and rights of the people with whom we work. The Code of Conduct applies to all work carried out by CISLAC and her grantees.

The standards mentioned in this document direct the steering documents of CISLAC. **When you need detailed information regarding any issue, consult the Relevant policy or guidelines for that particular issue.**

Who are the rules for?

The rules apply for all permanent and temporary employees, interns, consultants, activists, volunteers, Journalist, photographers, people participating in CISLAC organized travels and all elected CISLAC representatives. They all have an obligation to behave according to CISLAC's Code of Conduct and have an obligation to prevent and report misconduct, and are required to sign the Code of Conduct.

When signing the Code of Conduct, you accept to follow the standards and rules CISLAC has for its employees and people representing the organization, and you have accepted to perform your work/duties to the best of your abilities and always keep CISLAC's best interest in mind.

When do rules apply?

As an employee or representative of CISLAC, you commit to act and behave in such a way that people will respect CISLAC and the work we do. This means to show good judgement

and ethics in the different situations that we face in our work. The rules in the Code of Conduct serve as a compass to guide in moral dilemmas though they don't give detailed instructions on how to behave in every situation. If uncertain, always consult your Line manager.

Always consider if a certain behavior or action reflects negatively on your work performance an/or CISLAC's Image negatively, even when you are off duty. Such Issues are e.g., the use of social media, security concerns, behavior related to child safeguarding and prevention of sexual exploitation and abuse, corruption and fraud.

Awareness and overall responsibility

Managers at CISLAC have the overall responsibility to ensure that all employees are familiar with the Code of Conduct, are updated on its content and understand how it applies in their specific context. Line managers are also responsible for making sure that all employees know how reporting of violations are done and followed up with.

Each individual employee has an obligation to make sure that they understand the purpose and content of the Code of Conduct and knows what is expected of them as representatives of CISLAC.

The Code of Conduct is a mandatory element during the onboarding process of new employees but shall also be followed up in other trainings, briefing and in the individual annual appraisal meetings.

An e-learning course called **CISLAC - Code of Conduct and expected staff behavior**¹ is available on the ALAC portal. This course shall be a mandatory part of all employees' onboarding processes.

How to read the Code of Conduct

The Code of Conduct consists of three sections in one comprehensive document.

The sections shall be read altogether,

1. **The Code of Conduct**
2. **Key terms and definitions (Annex 1)**
3. **The form to sign and declare that you have understood the content of the Code of Conduct**

2. Expected Behavior

General

Everyone has to follow the fundamental values that constitute the organization's base as

¹ <https://www.cislac.org/alac/>

expressed in the CISLAC Global Policy. We shall always treat people with respect and remember that we all are responsible for creating an environment that promotes fundamental human rights without discrimination.

Information and pictures showing persons shall be handled with Integrity and stored safely to avoid putting anyone at risk. For instance, you are encouraged to use social media to share about CISLAC's work, however make sure it is done respectfully and in line with CISLAC's Social Media policy.

3. Unacceptable Behavior

Harassment

It is not permitted to use any kind of discriminatory behavior, harassing or violence towards a colleague or any other person.

Sexual Exploitation and Abuse

Sexual exploitation and sexual abuse violate universally recognized international legal norms and standards and is unacceptable behavior and prohibited conduct". Since it is CISLAC's mission to protect the people we work with, rules regarding sexual exploitation and abuse are strict.

As a CISLAC employee or representative you accept the following:

- Never sexually exploit or sexually abuse any individual.
- Never consume, purchase, sell, possess and distribute any form of pornography.
- Never exchange money, employment, goods or services for sex, including sexual favor or other forms of humiliation, degrading or exploitative behavior. This includes the buying of or profiting from, sexual services from adults and/or children.
- Never exploit the vulnerability of any target group in any context of development, humanitarian or advocacy work.
- Never use your position to withhold development or humanitarian assistance, or give preferential treatment in order to solicit sexual favors, gifts, payments or any other form of personal advantages.

When working with crisis affected populations, given their increased vulnerability. CISLAC employees and representatives are not allowed to engage in any unprofessional relationship. In case there are doubts whether or not a country is in a crisis situation the regional director, or senior management at Head Office will determine the status.

Should you engage in a relationship with another CISLAC employee, someone in a partner organization or a member in a community where CISLAC is supporting long-term development or advocacy work, you need to inform your line manager. This is to prevent potential conflict of interests.

Child Safeguarding and protection violations

Children and youth are often one of the target groups in CISLAC project. When children become part of a target or reached population, there is also an increased likelihood of abuse or neglect. Keeping children and youth safe are central and fundamental aspects in all CISLAC's operations, and as employees or representatives we have to make sure all activities are in line with the Child Protection/Safeguarding Policy.

Always bear this in mind:

- Never expose children to risks or abuse, sexually or otherwise
- Always get consent from the child and the legal guardian before taking Pictures/filming children in group or individually, or before an extensive article on a child is written.
- Avoid taking Images with Information that could identify or put children in danger, and avoid compromising situations e.g., sexually suggestive photos and/or where children are not fully dressed.
- Always ensure that Images do not reveal Identifying Information about a child when sending Images electronically.
- Always act with sensitivity around conversations or questions to avoid upsetting a child emotionally.
- Always make sure that there are a minimum of two adults present when working in the proximity of children.
- Always protect personal Information regarding people, particularly children.
- Always use social media respectfully

Any bullying, physical or verbal harassment, Inappropriate touching, physical punishment, exposure to pornography eg, on-line grooming and trafficking, particularly when being with children, is prohibited.

As an employee or representative of CISLAC, It is prohibited to engage in any sexual activity with children under the age of 18 years, regardless of consent or the age of majority.

Mistaken belief in the age of a child is never a defense for such actions.

Alcohol and narcotic substances

The view on alcohol and drug use may vary from country to country. CISLAC has taken a clear position and as a consequence, alcohol is not permitted when CISLAC is entertaining. Consumption of alcohol affects your work performance and puts you, your colleagues and other people at risk and is therefore prohibited during office hours.

It is prohibited to purchase, consume, sell or distribute narcotic substances at all times.

Driving under the influence of alcohol or narcotic substances during working hours is not permitted since it is a security and insurance issue, and can be illegal.

When prescribed by a physician you may purchase and consume narcotic substances for medical reasons. In such a case you shall report to your Line manager.

Fraud, corruption and unethical business practices

CISLAC has policies and guidelines to support the understanding of what is expected regarding transparent, honest management of resources and business practices.

The different documents can be found on CISLAC's website². You are required to keep yourself updated on the content of the respective policies and guidelines. Always have this in mind:

- Never steal or misuse funds, property or any kind of resources
- Never engage in criminal transactions, falsifying documents, money laundering, taking commissions or influencing tender processes for benefit or illegal activities
- Never take part in activities that generate personal, organizational or collective profit such as buying and selling when such activities may affect or appear to affect CISLAC's credibility or integrity.
- Never use or accept bribes, receive or share profits such as cuts discounts for personal or improper group gain.
- Never use or distribute known unsafe products or supplies in any development or humanitarian setting
- Never accept gifts exceeding the TI threshold on gifts e.g. services, travels, tickets for entertainment, material goods from any provider.
- You may accept minor tokens or gifts to show respect of local traditions. Gifts shall always be declared to your Line manager who decides if it can be kept privately or should be handed over to CISLAC.

Spare-time job or other assignments outside CISLAC

Always consult with the Executive Director before undertaking any kind of spare-time job or assignment.

This includes voluntary and paid jobs and assignments. The Executive Director decides if the spare-time job is compatible with the CISLAC employment.

Assessment questions before decision:

- Is the spare-time job or assignment competing with the CISLAC employment?
- Does the scope of the spare-time job/assignment affect work performance in CISLAC?
- Does the spare-time job/assignment affect CISLAC's brand and reputation?

² <https://www.cislac.org/>

Safety and security violations

CISLAC works in challenging contexts. As an employee or representative, you have to follow safety and security plans for the state/country you are visiting or working in. The safety plans are there to protect you, your colleagues and CISLAC. Always ask the partner organization in the location you are going to work in/visit for the latest security plan and Information. It is not permitted to carry weapons or ammunition during office hours in the office or in your luggage.

4. Complaints, Incident and Disciplinary Procedures

Complaints and Incidents

As an employee you may encounter situations that contradict CISLAC's values or guidelines. This may for an example concern partners not meeting requirements or it may concern CISLAC's programs or an employee who is not living up to the standards in the Code of Conduct. Always report such situations. CISLAC must make sure that rights holders, partners, other stakeholders and employees are safe, and that we can be held accountable to our commitments. The Complaints and Response Mechanism (CRM) has been set up for this purpose.

Always report directly to your Line Manager/Executive Director any complaints and incidents regarding suspected violations of the Code of Conduct. Should the complaint relate to your supervising manager you can report to the Senior Management Team at head office directly, or via the whistleblowing system. Complaints regarding the Secretary General shall be sent to the Board of Directors, or via the whistleblowing system.

If requested, you are expected to cooperate in investigations of complaints or incidents. Other methods of reporting complaints and incidents:

Concerning employees: Use the administrative channel for reporting to send your complaints to the Executive Director with a copy to the Human Resource Department.

Concerning partners: Use the administrative channel for reporting to send your complaints to the Executive Director with a copy to the Human Resource Department

Whistleblowing system: Use the administrative channel for reporting to send your complaints to the Executive Director with a copy to the Human Resource Department. You can choose to report anonymously when using the whistleblowing system.

Non retaliation and confidentiality

When you are reporting an incident, It Is CISLAC's commitment to handle the matter with confidentiality, as described in CISLAC's Complaints Policy.

Confidentiality is crucial and documentation of the investigation is to remain confidential and is only shared on a strictly need-to-know-basis.

It is not allowed to purposely make false or misleading allegations in order to harm someone. This is considered harassment and will lead to disciplinary actions.

Disciplinary measures

Violation of the Code of Conduct will not be tolerated and may lead to internal disciplinary actions or even dismissal. If the violation is considered to be a crime, the case will be handed over to law enforcement authorities in accordance with relevant legislation.

5. Ownership and revisions

The Human Resource Manager at CISLAC's head office is the owner of the Code of Conduct. The document will be subject to a review on every strategic plan cycle with the adoption by CISLAC's Board of Directors.

6. Annex: Key Terms and Definitions

In this annex, you will find explanations and definitions regarding concepts that the Code of Conduct is based on. It is important that you read these through and that you make sure you understand what the different concepts mean. Should you have doubts or questions please ask your line manager for guidance. It is essential that you understand the Code of Conduct since it expresses what is expected of you as a CISLAC employee or representative.

Child or Minor: A person under the age of 18 (as defined by the Convention of the Rights of the Child)

Child safeguarding: The set of Internal, business critical policies, procedures and practice that CISLAC employs to ensure that the organization is child-safe.

This includes ensuring that:

- All behave appropriately towards children and do not abuse the position of trust that comes with their employment.
- All are aware of and respond appropriately to issues of child abuse and the sexual exploitation of children.
- CISLAC creates a child-safe environment in all activities by always assessing and reducing potential risks to children.

Complainant: The person making the complaint, including the alleged victim of the misconduct or another person who becomes aware of possible misconduct. You have an obligation to report any knowledge, suspicions, or concerns of breaches of this Code of

Conduct through appropriate channels within CISLAC. This includes any suspicion of sexual exploitation and abuse.

Corruption: Corruption is the abuse of power for illegitimate individual or group benefit. (Definition from the CISLAC Anti-Corruption guidelines).

Discrimination: Exclusion of treatment of, or action against an individual based on social status, race, ethnicity, caste, color, religion, gender, sexual orientation, age, marital status, national origin, political affiliation or disability.

Employee: Refers to, but not limited to, all permanent and temporary employees, interns, consultants, activists, volunteers, journalist, photographers, people participating in CISLAC organized travels and all elected CISLAC representatives.

Exploitation: Using one's position of authority, influence or control over resources, to pressure, force or manipulate someone by threatening or coercing them with negative repercussions as for instance withholding project assistance.

Fraud: An intentional distortion, deceit, trickery, and perversion of truth or violation of confidence, relating to CISLAC's financial, material, or human resources, assets, services and/or transactions, generally for the purpose of personal gain or benefit. Fraud is a criminal deception or the use of false representations to gain an unjust advantage.

Harassment: Harassment means any unwelcome comment or conduct that is offensive, demeaning, humiliating, derogatory, or any other inappropriate behavior that fails to respect the dignity of an individual. It is the perception of the individual that determines if an action shall be investigated to determine if it constitutes harassment. Harassment can be committed by or against any member or the community with whom CISLAC work, partners, employee, supplier, consultant or any other individual visiting or doing business with CISLAC (see also definition of sexual harass-Informed consent: Permission given with reasonable knowledge of the risks involved and the potential consequences and the available alternatives.

Misconduct: Any breach by an employee of applicable national or international law as well as violations of CISLAC's Internal rules or policies including this Code of Conduct, regulations or other instructions issued by the relevant director or authority including contextualized security provisions and sexual harassment policies.

Protection: Ensuring that individual basic human rights, welfare and physical security are recognized, safeguarded and protected in accordance with international standards.

Sexual abuse: The actual or threatened physical intrusion of a sexual nature, including inappropriate touching, by force or under unequal or coercive conditions (United Nations

Secretary General's Bulletin 2003/13, 9 October 2003; Special Measures for Protection from Sexual Exploitation and Abuse).

Sexual exploitation: Any actual or attempted abuse of a position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, sexually or politically from the sexual exploitation of another (United Nations Secretary General's Bulletin 2003/13, 9 October 2003; Special Measures for Protection from Sexual Exploitation and Abuse).

Sexual harassment: Sexual harassment means any unwelcome sexual advance, comment, expressed or implied sexual demand, touch, Joke, gesture, or any other communication or conduct of a sexual nature, whether verbal, written or visual, by any person to another individual. Sexual harassment may be directed at members of the same or opposite sex and includes harassment based on sexual orientation. It is the perception of the harassed Individual that determines if an action shall be Investigated to determine if it sexual harassment or abuse. Sexual harassment can occur between any one or more individuals, employee or beneficiary, regardless of their work relationship.

Spare-time job: A spare-time job means that you have an extra employment, a business beside your regular employment or an assignment that can be voluntary or paid.



APPENDIX 1

Code of Ethics

CISLAC's reputation and the trust and confidence of our donors, peer partners, clients and others are among our most vital corporate resources. Our organization is committed to conducting its affairs in an ethical manner based on the fundamental standard of honesty and fair dealing. This standard requires adherence to all laws, regulations, and normal ethical practices that apply to the organization's business activities.

As a result, CISLAC strongly encourages its employees to act as leaders and set a positive example of ethical behavior and integrity among our donors, peer partners, and clients in their conduct and business practices. All employees are expected to follow a basic code of ethical business behavior, which includes but is not limited to, the following items.

- Comply with the letter and spirit of all applicable laws.
- Faithfully comply with CISLAC's policies, practices, procedures, and contracts.
- Act in accordance with standards of professional integrity.
- Respect the rights, views and confidences of all colleagues and treat them with fairness, respect and good faith.
- Demonstrate and maintain a professional attitude towards individuals served, such as colleagues, donors, peer partners, applicants, consultants, clients and others.
- Avoid relationships that could impair professional judgment.
- Avoid relationships that involve or may involve a conflict between an employee's personal interest and the interest of CISLAC.
- Respect the privacy of persons served and hold in confidence all information obtained in the course of professional service.
- Maintain confidentiality when storing or disposing of client and employee records.
- Understand that CISLAC's intellectual property is considered the organization's property and may be used or disclosed only with proper authorization and only in the performance of an employee's duties.
- Respect and maintain the confidentiality of CISLAC's intellectual property following the termination of employment.
- Accurately represent education, training, experience and competencies as they relate to an employee's profession.
- Correct when possible, any misleading or inaccurate information and representations made by others concerning an employee's qualification or services.
- Avoid the appearance or suspicion of improper or illegal conduct in any business affairs.

Employees who participate or appear to participate in inappropriate or unethical behavior will be subject to the provisions of CISLAC's Disciplinary Guidelines. While it is not possible to list every circumstance that may be or appear to be unethical behavior, the following are examples of employee activities that must be avoided.

CISLAC employees:

- will not discriminate against or refuse professional services to anyone on the basis of race, color, creed, age, sex, religion, disability, nationality, sexual orientation, marital status or characteristics protected by law;
- will not participate or condone conduct that has the effect of creating an intimidating, hostile or offensive work environment;

- will not threaten the rights and safety of others, verbally or physically;
- will not exploit the trust of the public or colleagues;
- will not engage in or condone any form of harassment or discrimination;
- will not falsify organizational records such as timesheets, expense reports, etc.;
- will not carry weapons to or at work;
- will not steal or misuse organizational funds or property;
- will not use language or engage in actions which are inappropriate to the workplace or which create a racially, sexually or otherwise hostile environment;
- will not possess or distribute controlled substances or illegal drugs on CISLAC's property; and
- will not report to work under the influence of alcoholic beverages, controlled substances or illegal drugs.

Any employee who experiences unethical behavior or believes in good faith that there has been a violation of this policy has the right and responsibility to report the actual or perceived violation to their supervisor or the Director of Human Resources.

CISLAC reserves the right to administer appropriate disciplinary action for all forms of disruptive or inappropriate behavior. The disciplinary action taken may vary depending on the gravity of the offense. Severe violations of this code may result in an immediate discharge of an employee with or without notice. Employees who have questions about how this code of ethics applies in particular situations should discuss the exact circumstances with their supervisors. Supervisors may obtain further guidance from the Executive Director or his/her designee and the Administrative Officer.

Acknowledgement

As an employee of CISLAC, I understand my responsibility to work in the best interest of the organization and to avoid situations and actions that may be or may create the appearance of being in conflict with the organization's vision, mission and core values.

I acknowledge that it is my responsibility to read, understand and abide by the contents of the Code of Ethics.

Employee's Printed Name _____

Employee's Signature _____

Date _____