

SAVE THE CHILDREN ETHICAL STANDARDS AND REQUIREMENTS

ANTI-BRIBERY AND CORRUPTION

Our values and principles

Save the Children does not allow any partner, supplier, sub-contractor, agent or any individual engaged by Save the Children to behave in a corrupt manner while carrying out Save the Children's work.

What we do

Save the Children is committed to preventing acts of bribery and corruption through the following means:

Awareness: Ensuring that all staff and those who work with Save the Children are aware of the problem of bribery and corruption.

Prevention: Ensuring, through awareness and good practice, that staff and those who work with Save the Children minimise the risks of bribery and corruption.

Reporting: Ensuring that all staff and those who work with Save the Children are clear on what steps to take where concerns arise regarding allegations of bribery and corruption.

Responding: Ensuring that action is taken to support and protect assets and identifying cases of bribery and corruption.

To help you identify cases of bribery and corruption, behaviour which amounts to corruption includes but is not limited to:

- (a) Paying or Offering a Bribe – where a person improperly offers, gives or promises any form of material benefit or other advantage, whether in cash or in kind, to another in order to influence their conduct in any way.
- (b) Receiving or Requesting a Bribe – where a person improperly requests, agrees to receive or accepts any form of material benefit or other advantage, whether in cash or in kind, which influences or is designed to influence the individual's conduct in any way.
- (c) Receiving or Paying a so-called 'Grease' or 'Facilitation' payment – where a person improperly receives something of value from another party for performing a service or other action that they were required by their employment to do anyway.
- (d) Nepotism or Patronage – where a person improperly uses their employment to favour or materially benefit friends, relatives or other associates in some way. For example, through the awarding of contracts or other material advantages.
- (e) Embezzlement - where a person improperly uses funds, property, resources or other assets that belong to an organisation or individual.
- (f) Receiving a so-called 'Kickback' Payment – where a person improperly receives a share of funds, a commission, material benefit or other advantage from a supplier as a result of their involvement in a corrupt bid or tender process.
- (g) Collusion – where a person improperly colludes with others to circumvent, undermine or otherwise ignore rules, policies or guidance.
- (h) Abuse of a Position of Trust – where a person improperly uses their position within their organisation to materially benefit themselves or any other party.

In order that the above standards of reporting and responding are met, **this is what is expected of you:**

You have a duty to protect the assets of Save the Children from any form of corruption. Furthermore, you must immediately report any suspicion of bribery or corruption to the Save the Children senior management team or Country Director and not to anyone else. Failure to report will be treated as serious and may result in termination of any agreement with Save the Children.

You are obliged to:

- act quickly and get help
- encourage your own staff to report on bribery and corruption
- contact the Save the Children senior management team or Country Director with your concerns immediately (or their senior manager if necessary)
- keep any information confidential to you and the manager.

Attempted corruption is as serious as the actual acts and will be treated in the same way under these requirements.

If you want to know more about Save the Children's Anti-Bribery and Corruption Policy then please contact your Save the Children representative.

CHILD SAFEGUARDING

Children First

A code of behaviour for working safely with children

Keeping children safe is our top priority. We have a zero tolerance approach to all forms of child abuse and exploitation by any of our representatives. Whether you're a member of staff, volunteer or partner of Save the Children - you must follow this code of behaviour.

A child is anyone under the age of 18 – wherever you are

- Do** challenge attitudes and behaviours that contravene this code of behaviour
- Do** treat all children with dignity and respect
- Do** respect a child's right to personal privacy
- Do** plan Save the Children activities with children to have more than one adult present; or be within sight or hearing of another adult
- Do** ensure that there are separate sleeping areas for Save the Children representatives and children with whom they are working
- Do** tell your colleagues where you are and what you are doing when you are working with children
- Do** treat all children according to their needs, do not show favouritism
- Do** remember someone might misinterpret your actions, even if you mean well
- Do** allow children to talk about their concerns
- Do** make sure that anyone who works with Save the Children is made aware of this code of behaviour
- Do** take all allegations, concerns and suspicions of abuse seriously and report them

Do not trivialise child abuse

Do not engage in any form of sexual activity with anyone under the age of 18, regardless of the age of consent or custom locally

Do not physically, sexually or emotionally harm, or threaten to harm a child

Do not take part in inappropriate physical, verbal or sexual behaviour with or in the presence of children (including online or via mobile phones)

Do not send private messages to children you've met through Save the Children, for example private messaging on social media

Do not drink alcohol or use harmful substances when working with children and never supply alcohol or harmful substances to a child

Do not do things of a personal nature for a child that they can do for themselves

Do not place children in unsafe situations

Do not engage in relationships which could be an abuse of trust, for example a sexual relationship with a beneficiary family member

Do not rely upon your good reputation to protect you from any complaints or allegations

Do not allow concerns, allegations or suspicions of abuse to go unreported

What do I do if...?

A child tells you that they are being abused or exploited or you have a concern about a child you must:

- * Ensure the child is not in immediate danger
- * Allow the child to speak without interruption and accept what they say
- * Be understanding and reassuring but do not give your opinion
- * Do not promise to keep secrets, but do say you need to tell someone who can help
- * Write careful notes of what was said, using the actual words wherever possible
- * Contact a Child Safeguarding Focal Point immediately

There is a concern, complaint or allegation about an adult or yourself involving a child, you must:

- * Ensure the child is not in immediate danger
- * Contact the SCUK Director of Child Safeguarding on Child.Safeguarding@savethechildren.org.uk if the concern is about a SCUK representative
- * Contact the SCI Director of Global Child Safeguarding on childsafeguarding@savethechildren.org if the concern is about a SCI representative
- * Write careful notes of what you witnessed, heard or were told

REMEMBER

It is your duty to report - DO NOT investigate

Ensure you know who your Child Safeguarding Focal Point is

If you're in the UK and a child is at immediate risk of significant harm contact the Police by dialling 999

If you're in any doubt about what to do contact the SCUK Director of Child Safeguarding or the SCI Director of Global Child Safeguarding

LIVING WAGE

Centre for Civil Society Limited is a wholly owned subsidiary of Citizens UK Charity t/a Living Wage Foundation (a charity registered 1107264 in England & Wales) which is responsible for the programme under which employers can apply for Living Wage Employer Accreditation to indicate that the employer has adopted an equitable employment policy in relation to its staff in accordance with the minimum standards stipulate by the Living Wage Foundation.

Save the Children has committed to the Living Wage and is an accredited body.

1. Save the Children requires that any contractors and sub-contractors, which supply an employee (other than an apprentice or intern) who provides a service to or on behalf of Save the Children involving 2 or more hours of work in any given day in a week, for 8 or more consecutive weeks in a year on:
 - 1.1. Save the Children's premises; and/or
 - 1.2. property owned or occupied by Save the Children (including where Save the Children is a tenant and is provided building-related services through a lease); and/or
 - 1.3. land which Save the Children is responsible for maintaining or on which it is required to work; andshall adopt the measures set out in paragraph 2 below in relation to such individuals.
2. For the duration of the performance of the services, any contractors and sub-contractors shall, in relation to its employees:
 - 2.1. pay all employees aged 18 or over not less than the London Living Wage (as set by the Greater London Authority or any successor body) or the National Living Wage (as set by the Living Wage Foundation or any successor body);
 - 2.2. increase the amount which it pays to affected employees by the same amount as any increase to the London Living Wage or the National Living Wage, within 6 months of the date on which any increase is officially announced; and
 - 2.3. notify all affected employees of the date of the next increase within one month of the official announcement, unless the employees have been previously notified about the date on which they will receive at least the increase in the National and/or London Living Wage.

SAVE THE CHILDREN'S HUMAN TRAFFICKING AND MODERN SLAVERY POLICY

1. Our values and principles

Save the Children does not allow any partner, supplier, sub-contractor, agent or any individual engaged by Save the Children to engage in Human Trafficking or Modern Slavery.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

2. What is human trafficking and modern slavery?

The Modern Slavery Act (MSA) 2015 covers four activities:

Slavery	Exercising powers of ownership over a person
Servitude	The obligation to provide services is imposed by the use of coercion
Forced or compulsory labour	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation

Modern Slavery, including human trafficking, is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to Modern Slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure Modern Slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling Modern Slavery throughout our supply chains, consistent with our national and international disclosure obligations, and shall comply with all applicable laws, statutes, regulations and codes from time to time in force, including:

- (a) UK Modern Slavery Act 2015 (see above);
- (b) US Trafficking Victims Protection Act 2000;
- (c) USAID ADS 303 Mandatory Standard Provision, Trafficking in Persons (July 2015); and
- (d) International Labour Standards on Child Labour and Forced Labour.

3. Our approach to preventing human trafficking and modern slavery

Save the Children is committed to preventing human trafficking and modern slavery, including through the following means:

Awareness: Ensuring that all staff and those who work with Save the Children are aware of the problem of

human trafficking and modern slavery.

Prevention: Ensuring, through awareness and good practice, that staff and those who work with Save the Children minimise the risks of human trafficking and modern slavery.

Reporting: Ensuring that all staff and those who work with Save the Children are clear on what steps to take where concerns arise regarding allegations of human trafficking and modern slavery. Any concerns or suspected incidents of modern slavery or human trafficking in Save the Children UK's supply chain should be reported to procurement@savethechildren.org.uk

Responding: Ensuring that action is taken to identify and address cases of human trafficking and modern slavery.

To help you identify cases of human trafficking and modern slavery, the following are examples of prohibited categories of behaviour:

- a. '**chattel slavery**', in which one person owns another person.
- b. '**Bonded labour**' or '**debt bondage**', which is when a person's work is the security for a debt – effectively the person is on 'a long lease' which they cannot bring to an end, and so cannot leave their 'employer'. Often the conditions of employment can be such that the labourer can't pay off their debt and is stuck for life, because of low wages, deductions for food and lodging, and high interest rates.
- c. '**Serfdom**', which is when a person has to live and work for another on the other's land.
- d. **Other forms of forced labour**, such as when passports are confiscated (sometimes by unscrupulous recruitment agencies) from migrant workers to keep them in bondage, or when a worker is 'kept in captivity' as a domestic servant. If a supplier or contractor appears to impose excessively harsh working conditions, or excessively poor wages, then you should always be alive to the possibility that a form of forced labour is occurring, and take care with your due diligence.
- e. '**Child slavery**', which is the transfer of a young person (under 18) to another person so that the young person can be exploited. Child labour may, in fact, be a form of child slavery, and should not be tolerated. See the Save the Children Child Safeguarding Policy for further details.
- f. '**Marital and sexual slavery**', including forced marriage, the purchase of women for marriage, forced prostitution, or other sexual exploitation of individuals through the use or threat of force or other penalty.

4. The commitment we expect from commercial partners

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we may include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

Any concerns or suspected incidents of modern slavery or human trafficking in Save the Children UK's supply chain should be reported to procurement@savethechildren.org.uk

Please contact your Save the Children representative if you have further questions.

