

# Transparency International UK

## Policy Manual

Compiled November 2024

Transparency  
International UK  
10 Queen Street Place  
London, EC4R 1AG

Transparency International UK  
Policy Manual  
(Last updated November 2024)

Welcome to Transparency International UK

This manual is a compilation of Transparency International UK (TI-UK), policies and procedures. They range from our principles as an organisation including our approach to anti-bribery and corruption, accepting gifts and hospitality and how we protect the independence and impartiality of our research and advocacy. In our workplace we wish to ensure that all colleagues are treated with dignity and respect and so a number of policies outline the approaches we take to uphold this including equal opportunities and promoting diversity, anti-bullying & harassment, safeguarding along with our approach to grievance and disciplinary action when things go wrong. Our employee benefits and the way in which we handle change as an organization are also outlined along with important office housekeeping and arrangements including data protection. Please read it thoroughly and retain it for future reference. Although the Manual is addressed primarily to employees of TI-UK, consultants, interns and volunteers are also advised to read it. In line with our principles for transparency and accountability we publish the manual on our public web-site.

The policies and procedures described in this manual are subject to change and from time to time you may receive updated information concerning changes.

We wish you the very best success in your position, look forward to your contribution to our team and hope your relationship with TI-UK will be a personally rewarding experience.

**Daniel Bruce**

Chief Executive

Please note:

- This manual has been compiled from individual documents on the above date. These may change and the latest versions of the *individual* documents should be seen as the definitive versions.

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## Introduction

Since 1995, Transparency International UK (TI-UK) has played a leading role in tackling corruption in the UK, Britain's role in corruption overseas, and corruption in global sectors critical to international security and development. We are part of the global Transparency International movement, which defines corruption as the abuse of entrusted power for private gain.

## Global Vision, Mission, Values and Principles of TI-UK

**Our Vision** is a world in which governments, business, civil society, and the daily lives of people are free from corruption.

**Our Mission** is to stop corruption, promote integrity and, to that end, hold power to account for the common good.

**Our Core Values outline that we will:** act with integrity; value and respect differences; work collaboratively across Transparency International, our global Movement and with partners; and we will have the courage to demand better of ourselves and others.

### Our Guiding Principles

We are a civil society organization committed to respecting the following principles<sup>1</sup>:

1. As coalition builders, we will work cooperatively with all individuals and groups, with for profit and not for profit corporations and organizations, and with governments and international bodies committed to the fight against corruption, subject only to the policies and priorities set by our governing bodies
2. We undertake to be open, honest and accountable in our relationships with everyone we work with and with each other
3. We will be democratic, politically non-partisan and non-sectarian in our work
4. We will condemn bribery and corruption vigorously and courageously wherever it has been reliably identified
5. The positions we take will be based on sound, objective and professional analysis and high standards of research
6. We will only accept funding that does not compromise our ability to address issues freely, thoroughly and objectively
7. We will provide accurate and timely reports of our activities to our stakeholders
8. We will respect and encourage respect for fundamental rights and freedoms
9. We are committed to building, working with and working through National Chapters worldwide
10. We will strive for balanced and diverse representation on our governing bodies
11. As one global movement, we stand in solidarity with each other and we will not act in ways that may adversely affect other Chapters or the TI movement as a whole.

<sup>1</sup>These Principles were adopted by the TI Annual Members Meeting in Prague (2001) and subsequently updated by the AMMs in Bali (2007) and Berlin (2011).



## Our People

All employees are integral to the success of TI-UK. No matter what role they play, each of them contributes something important to making this a successful community and organisation. While the roles may vary, the basic expectations of TI-UK do not.

It is expected that all employees observe the following general guidelines:

- Be committed to the success of TI and TI-UK – not solely their own position or team
- Do their job enthusiastically and to the best of their abilities – hold themselves to high standards
- Treat others with courtesy, respect, and fairness
- Value and respect differences
- Strive to grow professionally
- Be honest in communication
- Take responsibility for raising issues and solving problems
- Be thoughtful representatives of TI-UK and its resources
- Acknowledge others for a job well done

All employees can expect the following from TI-UK:

- Fair and equitable treatment
- Acknowledgement for a job well done
- Help in achieving professional goals
- Fair feedback regarding performance
- An environment free of discrimination and harassment
- To be listened to with respect
- A response to their concerns

## Advocacy & Political Engagement Policy

Owner:	<b>Chief Executive</b>	Status:	Approved
Last reviewed:	August 2023	Review date:	August 2025
To be read in conjunction with these other policies and procedures:		<ul style="list-style-type: none"> <li>• Governance section of the website</li> <li>• Anti-Bribery Policy</li> <li>• Annual Reports &amp; Accounts</li> <li>• TI-UK Annual Plan</li> </ul>	

### Purpose of the document

TI-UK is committed to ethical behaviour in all aspects of our work. This policy on advocacy and political engagement aims to complement our existing ethics architecture by spelling out clearly what we expect of our organisation in our commitment to being open and ethical in our advocacy activities.

TI-UK's Anti-Bribery Policy includes specific details on conflicts of interest and giving and receiving gifts and hospitality.

TI-UK publishes on their website the following information, which is updated – at minimum – on an annual basis:

- A list of government departments engaged through advocacy efforts over the course of the previous financial year.
- A comprehensive list of coalition groups and organisations that TI-UK is a member of or supports financially.
- A comprehensive list of secondees appointments made to or from TI-UK over the course of the previous financial year.
- A list of employee appointments and contractors engaged in the preceding year whose recent employment was in the public sector, and the organisation or department where this was.
- Information on advocacy objectives for the current financial year

### The Policy

We support and promote responsible, accountable, transparent and democratic political processes that benefit society at large. This requires us to adopt ethical policies of the highest standards, respecting the roles and responsibilities of the institutions and organisations we seek to engage, being open about our interactions with decision-makers and the interests we seek to advance, and being attuned to our mission and values throughout.

To that end, we commit to ensuring that our advocacy and political engagement activities are consistent with our mission, based on evidence and advancing defined public interests. We are committed to ensuring that our advocacy and policy positions are aligned with our institutional values and that we respect, protect and fulfil the basic principles as outlined in the UN Convention against Corruption, OECD Anti-Bribery Convention, UN Declaration of Human Rights and its supplementary Conventions.

This Policy applies to all TI-UK employees and Trustees, consultants and advisors mandated by TI-UK to carry out advocacy and political engagement activities.

## Definitions

The term 'advocacy' generally encompasses a broad range of activities which seek to influence public policy decision-making. These can include both mobilising third-party involvement to influence a decision-maker and directly engaging with a decision-maker. It refers to any communication which is directed towards a public policy decision-maker or person with influence with the purpose of seeking to influence that person and their decisions. This includes the preparation of, initiation and follow-up to the communications made. Targets of our advocacy include public decision-makers, officials, regulators and representatives at national, supranational and subnational levels and other international organisations and associations.

The definition that TI-UK uses in our research is wider than that found in UK legislation and includes advocacy activities such as participating in public consultations, attending party conferences, participation in Advisory Groups, briefing parliamentarians and involvement in non-electoral government campaigns.

## Revolving Door (post-employment conflicts of interest) policy

TI-UK believes that exchanges of expertise and information between public and voluntary sector can make a positive contribution to the public interest. However, TI-UK also believes that the so-called Revolving Door can at times lead to conflicts of interest, and that these need to be appropriately identified, managed and mitigated. As a charity, TI-UK has an obligation to operate in the public interest, and we expect that decisions made about conflicts of interest should always be resolved in favour of the public interest. We recognise that the implications of the revolving door differ between organisations which have an explicit private interest and those organisations which act in the public interest.

Employees and consultants are expected to follow these guidelines:

1. At minimum, those who work for TI-UK should follow both the spirit and the letter of any post-employment obligations placed on them by a former public sector employer.
2. TI-UK requires its employees to operate to best practice standards in this area.
3. In principle, employees from the public sector should not be involved in seeking to influence their former department (or equivalent) for a period of time after leaving. The time period will depend on the level of seniority of the post held while in public office, and the nature of their responsibilities, and will be agreed with the employee at the start of their employment with TI-UK, taking into account whether any such influence might reasonably be considered to be in the public interest.
4. If an employee or consultant has concerns about how to act in any given circumstance, they should refer the situation to the Chief Executive.

## Oversight & procedure

Throughout the course of the financial year, each TI-UK programme reports to the Board on its activities and these reports are scrutinised at the quarterly Board meetings. These reports include the activities of TI-UK consultants that assist the programmes with their advocacy and political engagement activities.

All programmatic and core teams within TI-UK report to the Board on significant external engagements (e.g. such as face to face meetings and conference calls), events, speaking engagements, media appearances and parliamentary citations on a quarterly basis.

Each year, TI-UK draws up an annual business plan which sets out the organisation's plans and objectives for the coming financial year. During this process, TI-UK reviews its programmatic objectives, and resources. TI-UK recognises the importance of managing our memberships, and so a review of membership of other groups and organisations is also included in this process. This plan is reviewed and approved by both the Senior Leadership Team and the Board of Trustees.

TI-UK pursues constructive two-way engagement with stakeholders, such as its members, civil society, government, parliament, business, the media, and local campaign groups.

A clause on adherence to this policy is included in all employee and consultant contracts.

As a non-political organisation, registered as a charity, we will not provide any financial contributions<sup>1</sup> to political parties.

Any expenditure on political activities (such as the purchase of entrance tickets to political party conferences and associated expenditure) over £500 must be signed off by the line manager of the staff member exercising the expenditure. TI-UK employees occasionally attend political party conferences on behalf of TI-UK to advocate in line with our stated advocacy aims. TI-UK does not contract the paid services of serving politicians.

## Principles

TI-UK subscribes to the following principles in its advocacy work:

1. We will identify ourselves by name and organisation to those we seek to influence at the earliest appropriate opportunity.
2. We will neither intentionally misrepresent, nor look to create any false impressions, as to the true nature and status of our inquiries.
3. We will always attempt to disseminate information that is reliable, verifiable and up-to-date.
4. We commit that the positions we take will be based on sound, objective and professional analysis and high standards of research.
5. We commit not to misrepresent public sentiment intentionally.
6. We will not engage in any other undue influence on decision-makers, including inducements, manipulation, intimidation or coercion.
7. Under no conditions will we provide any undue advantages to decision-makers, their associates or their family members.

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<sup>1</sup> We do not include payment for services (e.g. the cost of entrance tickets to political party conferences) within the definition of 'financial contribution'.

8. We will not offer gifts to decision-makers and any hospitality offered must be reasonable, bona fide and socially acceptable, not allowing for any impression of improper influence over the political process or the execution of their professional duties. We will only invite decision-makers to events and on fact-finding trips, subject to the informative purpose being clearly evident. Only reasonable food and accommodation may be offered, and no hosting or travel of accompanying guests will be covered by our organisation. TI-UK's full policy on gifts and hospitality is set out in our Anti-Bribery Policy.
9. As a non-political organisation, registered as a charity, we will not provide any financial contributions to political parties.<sup>2</sup>

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<sup>2</sup> Whilst we may help convene cross-party engagement with our mission (e.g. such as supporting the All Party Parliamentary Group on Anti-Corruption), as a non-political registered charity, we will not provide financial contributions to political parties.

## Transparency International UK's Anti-Bribery Programme

Owner:	<b>Chief Executive</b>	Status:	Approved
Last reviewed:	September 2023	Review date:	September 2025
To be read in conjunction with these other policies and procedures:		<ul style="list-style-type: none"><li>Whistleblowing Policy</li></ul>	

### 1. Introduction

Transparency International UK (TI-UK)'s anti-bribery Programme, which is set out in this document, is compatible with the Business Principles for Countering Bribery and the Bond Anti-Bribery Principles for NGOs (Bond Anti-Bribery Principles).<sup>1</sup>

This policy contains as annexes, criteria for testing for compliance and TI-UK's policies on donations and conflicts of interest.

### 2. Principles

The TI-UK Programme is based on the seven Bond Anti-Bribery Principles:

#### High-Level Commitment

The Board of Trustees and senior management are committed to and oversee the implementation of a policy of zero-tolerance, recognising that bribery is contrary to fundamental values of integrity, transparency and accountability and undermines organisational effectiveness.

#### Risk Assessment

Bribery risk assessment is an integral part of the organisation's overall and on-going risk management process.

#### Devise and Implement Robust Anti-Bribery Procedures

TI-UK has devised and is implementing and maintaining robust procedures (set out in this document) which are proportionate to the risks and to the size, resources and complexity of the organisation.

#### Due-diligence Assessment of Partners, Agents and Contractors

TI-UK assesses the bribery risk associated with entering into partnership or contracting arrangements with other entities and then carries out periodic due diligence based on that risk assessment. Partnership or contractual arrangements are checked to ensure that these organisations have policies and procedures which are consistent with TI-UK's own procedures.

#### Dissemination and Communication

TI-UK has established means for effective internal and external communication of its policy and procedures. The organisation undertakes training and awareness programmes to ensure employees, agents and partners are aware of the potential risks, how bribery might affect them, what they should do if they are offered a bribe, and the consequences should they be found to have made or received a bribe.

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<sup>1</sup> [http://www.bond.org.uk/data/files/Bond\\_Anti-Bribery\\_Principles\\_and\\_Guidance\\_for\\_NGOs.pdf](http://www.bond.org.uk/data/files/Bond_Anti-Bribery_Principles_and_Guidance_for_NGOs.pdf) Add references  
[http://www.transparency.org/whatwedo/tools/business\\_principles\\_for\\_countering\\_bribery/1/](http://www.transparency.org/whatwedo/tools/business_principles_for_countering_bribery/1/)

### Monitoring and Evaluation

Implementation of anti-bribery procedures is monitored as part of overall risk management and internal control processes. Periodic reviews of anti-bribery procedures are made and reported as part of governance and accountability processes.

### Collective Action

TI-UK is committed to sharing information and strengthening collective action to prevent bribery.

In addition, TI-UK adheres to two other important principles:

### Openness

TI-UK strongly encourages a culture of openness in which bribery risks are discussed, in order to respond better both to immediate circumstances and in the longer-term.

### Transparency

TI-UK commits to be fully transparent about both its approach to anti-bribery and all relevant information such as entries to the gifts and hospitality registers and sources of its funding.

## 3. TI-UK's Policy

TI-UK has a zero tolerance policy towards the giving and receipt of bribes, and of bribery and corruption in any form. TI-UK aspires to operate to best practice standards, and complies with all relevant laws in all the jurisdictions in which it operates. Employees and others who refuse to act unethically will be protected even when this might result in lost opportunities to TI-UK (including revenue). This policy extends to all of TI-UK's dealings and transactions in all countries in which it or its consultants and associates operate. This policy underpins TI-UK's anti-bribery programme, which is regularly revised to capture changes in corruption risk, law and best practice. All Trustees, members of the Advisory Council, employees, consultants and volunteers are required to comply with this policy.

This policy has been approved by the TI-UK Board and is incorporated in all TI-UK contracts of employment and consultant or partner contracts.

## 4. TI-UK's anti-bribery Programme

### 4.1 Risk assessment

TI-UK undertakes periodic assessments of the bribery risks that it faces. On an annual basis the risk assessment together with key performance indicators is published on the TI-UK web-site. The key areas of risk identified are:

- Gifts
- Hospitality
- Overseas travel
- Receipt of donations
- Conflicts of interest
- Research activities
- Appointment and activities of consultants.

## 4.2 Robust anti-bribery procedures

TI-UK's procedures are primarily designed to mitigate the risks identified by the risk assessment. The procedure for each of these is identified below.

### 4.2.1 Gifts

TI-UK's policy on the giving and receiving of gifts is:

- No TI-UK Trustee, member of the Advisory Council, employee, consultant or volunteer accepts directly or indirectly any discount, gift, entertainment (which includes meals, cultural events, tourist visits etc) or favours (referred to as gifts) that may influence or be perceived to influence the exercise of their official function, or the performance of their official duties or their judgement. Examples of criteria for making such judgements are attached in Annex 1.
- All gifts with a value of more than £75 are refused. All gifts between the value of £30 and £75 are registered in the TI-UK register of gifts. Such gifts are reported to the Chief Executive and via them to the Board. The register is maintained by a staff member delegated by the Chief Executive. The register is available for the information of all TI-UK Trustees, members of the Advisory Council, employees, consultants and volunteers. It is also publicly available on the TI-UK website.
- Gifts with a value below £30 should be reported to the recipient's line manager and may be kept by staff unless there are particular reasons to refuse the gift or add it to the register

Each individual, and ultimately their line/project manager (as appropriate), is responsible for ensuring that the gifts register is completed.

### 4.2.2 Hospitality

Hospitality includes meals, entertainment, transport, accommodation and any other activities that could reasonably be interpreted as offering or receiving hospitality. TI-UK's policy on giving and receiving hospitality is:

- No TI-UK Trustee, member of the Advisory Council, employee, consultant or volunteer:
  - Accepts directly or indirectly any hospitality (as defined) that may influence or be perceived to influence the exercise of their official function, or the performance of their official duties or their judgement. Examples of criteria for making such judgements are attached in Annex 1.
  - Offers directly or indirectly any hospitality (as defined) that may influence or be perceived to influence improperly the actions of other persons (including foreign public officials). Examples of criteria for making such judgements are attached in Annex 1.
- All hospitality received or given of a value estimated to exceed £50 is reported to the Chief Executive and recorded in a register that is maintained by a staff member delegated by the Chief Executive. The register is available for the information of all TI-



UK Trustees, members of the Advisory Council, employees, consultants and volunteers. It is also publicly available on the TI-UK website.

Each individual, and ultimately their line manager/project manager (as appropriate), is responsible for ensuring that the hospitality register is completed.

#### 4.2.3 Overseas Travel

Overseas travel is a key risk area for TI-UK, and its zero tolerance policy applies equally to overseas travel.

In particular, TI-UK recognises that facilitation payments are bribes and illegal. Facilitation payments are small payments made to secure or speed up routine actions, usually by public officials, such as issuing permits, immigration controls, providing services or releasing goods held in customs. Induction training for new employees on anti-bribery and corruption includes specific guidance as to how to avoid circumstances where facilitation payments can arise. It is also our policy that we require that our agents and other intermediaries, contractors and suppliers do not make facilitation payments and other bribes on our behalf.

When there is a suspicion that a payment might be considered a facilitation payment, it should only be made if the official or third party can provide a formal receipt or written confirmation of its legality. If practicable, senior management approval should be obtained for the payment.

If a payment demand is accompanied by immediate threat of physical harm, then the over-riding principle is to put safety first. In these circumstances, the payment should be made and then reported immediately to the Chief Executive, recording the circumstances and amount of the payment. TI-UK will also report any such incidents to the relevant UK and foreign authorities.

#### 4.2.4 Receipt of Donations

TI-UK recognises that donations represent a corruption risk, in particular in cases where a donor may seek to compromise TI-UK's independence by influencing improperly the policies, activities or decision-making of TI-UK. TI has a global policy (applicable to the Secretariat and all national chapters) on the receipt of donations, which has been supplemented by a TI-UK policy on anonymous donations. These are reproduced in Annex 2.

#### 4.2.5 Receipt of Crypto-assets

TI-UK does not accept the receipt of crypto-assets.

### 4.3 Conflicts of Interest

TI-UK recognises that conflicts of interest may arise that could lead to Trustees, members of the Advisory Council, employees, consultants or volunteers taking decisions, or appearing to take decisions, that are based on personal interest and not the interest of the organisation. Such conflicts of interest can be a form of corruption. TI-UK therefore has a policy on conflicts of interest, which is attached in Annex 3.

#### 4.3.1 Independence of Research

TI-UK publishes research on a regular basis. The Board and Chief Executive are required to take all necessary precautions to ensure that the integrity of decision-making in the subjects selected for research, the research process, the presentation of the results and the means of publication are not compromised by external interests.

#### 4.3.2 Consultancy Services

TI-UK recognises that consultancy and advisory services are high-risk due to the contractual association of TI-UK with clients that are perceived to have engaged in corrupt behaviour and the potential for clients to approach TI-UK with the intention of improperly enhancing their own reputations. TI-UK has therefore put into place procedures to mitigate these risks. These are attached as Annex 4.

#### 4.3.3 Appointment and Activities of Consultants

Certain areas of TI-UK activities make extensive use of external consultants. It is TI-UK policy that they should be properly vetted to ensure that they have not previously been associated with corrupt activity; their contractual arrangements require adherence to TI-UK's anti-bribery policy and procedures and they receive appropriate training; and that TI-UK's contracts with them allow for termination of a relationship in the case of a breach of TI-UK's anti-bribery policy.

#### 4.4. Use of Partners and Agents

Certain areas of TI-UK's work may require the use of partners and agents. It is TI-UK policy that they should be properly vetted to ensure that they have not previously been involved in corrupt activity; their contractual arrangements require adherence to TI-UK's anti-bribery policy and procedures and they receive appropriate training as appropriate; and that TI-UK's contracts with them allow for termination of a relationship in the case of a breach of TI-UK's anti-bribery policy.

#### 4.5 Dissemination and Communication

##### 4.5.1 Induction

All Trustees, members of the Advisory Council, employees, consultants and volunteers are inducted into this policy. The policy forms part of the contract or agreement for each of these parties.

##### 4.5.2 Training

All employees, consultants and volunteers receive basic training in how to understand and avoid bribery. Those giving the training are also seen as having received the training. The effectiveness of the training is evaluated and reported on a quarterly basis to the Senior Leadership Team. This ensures that new recruits are undertaking the training but also that it continues to meet their expectations and training needs. Those in high-risk positions receive more detailed training based on the risks they will be facing.

High-risk positions are currently categorised as:

- Those involving travel to countries that are high-risk for bribery
- Those in which individuals are responsible for procurement of goods and services
- Those in which individuals are responsible for recruitment
- Those in which individuals are responsible for fundraising
- Those in which individuals are responsible for commissioning or over-seeing research
- Those in which individuals are exposed to any of the other high-risk areas highlighted in 4.1

##### 4.5.3 Communication to all Partners and Stakeholders

TI-UK's policy and procedures are made publicly-available and are published on the TI-UK website.

#### 4.6 Monitoring and Evaluation

TI-UK's anti-bribery programme is reviewed periodically by the Chief Executive and the SLT. This will typically cover:

- a review of the risk assessment
- a review of training and training records
- a review of the gifts register
- a review of the hospitality register

#### 4.7 Collective Action

Since TI-UK is an anti-corruption organisation operating largely in the UK, there are limited opportunities for TI-UK to participate in collective action in order to eliminate any bribe-paying. However, TI-UK strongly supports the principle of collective action, and offers advice and expertise to others genuinely seeking to pursue collective action.

#### 4.8 Confidential Reporting

TI-UK's confidential reporting procedures are designed to reflect the size of the organisation. Allegations can be sent via the [Reportingconcerns@transparency.org.uk](mailto:Reportingconcerns@transparency.org.uk) email where they will be logged and actioned by a senior employee (normally the Chief Operating Officer). A key principle of TI-UK's anti-bribery programme is openness, and all employees and other parties are encouraged not simply to report concerns and incidents, but to generate active discussion about them in order to respond better both to immediate circumstances and in the longer-term.

TI-UK has a separate policy on Whistle-blowing for breaches of procedure that are in the public interest. This details the procedures to be followed and the bodies to which reports may be made. It contains, inter alia, provisions on confidentiality and protection for bona fide whistle-blowers.

#### 4.9 Responses

TI-UK will investigate any credible allegations of bribery and / or corruption using internal or, if necessary, external resources to do so. Commissioning that investigation will be the responsibility of the Chief Operating Officer or, if they are in any way implicated in the allegations, of the Chief Executive.

Investigations will be concluded as rapidly as is possible without compromising their integrity or thoroughness.

In the event that reporting to the Chief Executive and / or Chief Operating Officer is either not effective or inappropriate, whistle-blowing can be channelled through the Chair of the Board who may choose to refer it to the Ethics Advisory Panel. Alternatively, employees may contact the Ethics Advisory Panel Chair in confidence ([Ethics@transparency.org.uk](mailto:Ethics@transparency.org.uk)).

Should the allegations be proven, TI-UK may take any or all of the following actions:

- disciplinary action up to and including gross misconduct leading directly to dismissal;
- reporting the incident to the police or other authorities in relevant countries;
- legal action to recover lost assets.

All investigations, whatever their outcome, will be logged and reported to the Board. Where required, reports will also be made to the Charity Commission through Serious Incident Reporting. Requirements to report to donors will be followed in a timely manner and in line with funding agreements.

TI-UK encourages all employees to report details immediately if they suspect that bribery and / or corruption has been committed or see any suspicious acts or events. Malicious accusations may be the subject of disciplinary action.

## 5.0 Application of this Programme

This Programme is applicable to:

- All TI-UK employees
- Any consultant contracted by TI-UK while acting on TI-UK business, whether in a paid or unpaid capacity
- Any board member, Advisory Council member or adviser while acting on TI-UK business, whether in a paid or unpaid capacity
- Any volunteer or intern while acting on TI-UK business.

Each individual is personally responsible for ensuring that they adhere to the policy and procedures in this Programme. Line/project managers share this responsibility through monitoring the activities and performance of those they are managing.

## 5.1 Review

This policy is reviewed by the Senior Leadership Team every two years and approved by the Board. Where recommendations from external audit, the Charity Commission or other UK legislation demands or as a result of learning from incidents this policy may be up-dated more frequently.

## Annex 1: Example criteria to test if gifts, hospitality or reimbursed expenses comply with the anti-bribery programme:

Gifts, hospitality or reimbursed expenses should meet the following criteria:

- *Made for the right reason:* if a gift or hospitality, it should be given clearly as an act of appreciation, if travel expenses then for a bona fide business purpose
- *No obligation:* the gift, hospitality or reimbursement of expense does not place the recipient under any obligation
- *No expectations:* expectations are not created in the giver or an associate of the giver or have a higher importance attached to it by the giver than the recipient would place on such a transaction
- *Made openly:* if made secretly and undocumented then the purpose will be open to question;
- *Accords with stakeholder perception:* the transaction would not be viewed unfavourably by stakeholders if it were made known to them
- *Reasonable value:* the size of the gift is small and the value of the hospitality or reimbursed expense accords with general business practice in the charitable sector
- *Appropriate:* the nature of the gift, hospitality or reimbursed expense is appropriate to the relationship and accords with general business practice in the charitable sector
- *Legality:* it is compliant with relevant laws
- *Conforms to the recipient's rules:* the gift, hospitality or reimbursement of expenses meets the rules or code of conduct of the recipient's organisation
- *Infrequent:* the giving or receiving of gifts and hospitality is not a regular happening between the giver and the recipient
- *Reported:* the gift, hospitality or expense should be recorded and reported to management
- *Documented:* the expense is fully documented including purpose and approvals given and properly recorded in the books

## Annex 2: Policies of TI-Secretariat and TI-UK on Receipt of Donations

TI-S policy – to which TI-UK subscribes – is as follows:

### Introduction

Donations and other income enable TI to fight corruption. TI needs to secure the funding necessary to undertake its vital work. Secure and diverse funding enables TI to maintain its independence, protect its reputation and operate effectively. We will not accept funds that might harm the reputation of the organisation or impair its independence to pursue its mission.

### Background

The National Chapters and the Secretariat of TI (TI-S) are funded from diverse sources: foundations, governments, the private sector, individuals, membership fees, income from publications, events and other activities and from an endowment fund. Relying on many sources of income helps TI to maintain its independence. Funding may be unrestricted or tied to specific projects.

Generally, the National Chapters and TI-S ('TI Bodies') each raise their own funding. As regards fundraising for the Secretariat, the Donor Relations department leads and coordinates fundraising activities at TI-S. A sub-committee of the TI Board, the Fundraising Task Force, pursues and oversees major fundraising initiatives for the movement. This committee also advises on all matters referred to it under the procedure described below. TI must not risk jeopardising its reputation for honesty, openness and integrity. Its reputation could be compromised if a TI body received funding from sources that were perceived to be pursuing activities inconsistent with TI's mission.

### Policy

It is TI's policy to accept funding from any donor and whether monetary or in kind, provided that acceptance does not:

- impair TI's independence to pursue its mission
- endanger its integrity and reputation

### Scope

This Policy applies to all fundraising for all TI bodies, regardless of types of donor or amounts involved, unless otherwise stated in this document. It is to be applied to all new funding from existing donors and to all new donors in the future. It does not apply to income raised from the sale of publications or from fees for participation in conferences, events and other activities. Appropriate care to protect the reputation of TI should always be taken.

### Guidelines

Funding to enable TI bodies to carry out their work should be sought from a wide range of sources. Care should be taken to ensure that project-related funding does not result in undue influence over TI's programme work. Subject to maintaining TI's independence and reputation, TI bodies may accept funding from all kinds of sources. Each TI body should list all donations over €1,000 and publicly disclose them, including in the Chapter's Annual Report and on its website, and likewise in the case of TI-S. If there is a significant risk that receiving funds from a particular source would impair TI's independence or if there is a significant risk to TI's reputation from public association with the donor, then funding from that source must not be accepted by a TI body. Any donation to a TI body must be able to stand up to public scrutiny. TI's independence requires that a donor may be subject to the same criticism by TI as any other organisation or individual in a comparable situation. A donor accused of having been involved in corruption can expect no protection from TI.

TI can receive funding from corporations and donors from the private sector. This does not imply any endorsement of a donating company's policies or record. It is advisable that a potential donating company has made a public commitment to ethical standards (such as the UN Global Compact, the Business Principles etc.), and TI bodies may request that corporate donors sign a commitment to integrity before any donation from that company is accepted. No TI body should accept a donation from a company that is found to have engaged in corruption unless the company can demonstrate that this was a violation of the company's policies, that breach of these policies are being addressed in an appropriate manner, or that its policies have been amended to proscribe a similar violation in future. TI works with companies on the understanding that they are working towards a business environment in which bribery is not accepted.

### Procedure

It is the responsibility of the staff and Boards of Directors of TI bodies to ensure that TI's independence and reputation are not jeopardised. The procedure below describes the steps which should be followed when a staff or Board member believes that any TI body has accepted, or is considering accepting, funding from an inappropriate source. Other people associated with TI may also make use of this procedure.

- If any staff or Board member of a TI body is concerned that there is a threat to TI's independence or reputation from donations already received, or about to be accepted, the person(s) should draw this to the attention of their manager or the Chair of the Board of that particular TI body.
- If necessary, the manager or Chair of the body will consult with the Fundraising Task Force of the TI Board to seek advice on whether to accept funding from a specific donor.
- If any TI body proposes to accept more than €100,000 (or an amount greater than 20% of its overall budget) from any private company in a year, this should be brought to the attention of the TI Board Fundraising Task Force for their advice.
- All communications with the Fundraising Task Force of the TI Board should be made through a TI Board member or the Chief Executive of TI-S. The Fundraising Task Force will report to the TI Board all guidance given under this procedure.

(Passed by the Transparency International Annual Membership Meeting, 10 October 2004)

### TI-UK Policy on anonymous donations

The TI-UK specific policy on anonymous donations is as follows:

- Where the anonymous donation is £1,000<sup>2</sup> or below it is accepted with no follow up.
- For anonymous donations above £1,000 and below £5,000 TI-UK will require the name and address of the donor in order to establish that donations are from bona fide sources but will keep that name confidential. If such donations come from sources about which we are uncomfortable (e.g. offshore trust accounts etc.) further enquiries will be made. If an anonymous donation is received through the Charities Aid Foundation, no additional verification work needs to be carried out.
- Anonymous donations of £5,000 and above will require full due diligence.

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<sup>2</sup> This section was approved by the TI-UK Board on 28<sup>th</sup> April 2010 with specific limits of £500 and £5,000. These sums have been adjusted without any further changes.

- TI-UK recognises that in practice some donors wish to remain anonymous. In such cases, TI-UK should provide the necessary assurance that the donor's details will only be used to issue a receipt.



## Annex 3: TI-UK Policy on Conflicts of Interest

### Background

Conflicts of interest may arise from time to time in the course of the activities and decisions of persons associated with TI-UK as an employee, consultant or volunteer. These conflicts of interest may arise with regard to pecuniary or financial interests, or other interests that impede them in their duty to act in the best interests of TI-UK and the wider TI movement.

### Applicability

This policy applies, except as otherwise stated, to every person associated with TI-UK (Trustees, members of the Advisory Council, employees, consultants and volunteers). The Code of Conduct (applicable to Trustees, members of the Advisory Council, employees, consultants and volunteers) references a commitment to minimising conflicts of interest, and ensuring considerations are free of any personal advantage.

The activities and associations of family members may also create conflicts of interest or the appearance of conflicts of interest. All board members and senior staff members are expected to declare any such conflicts or potential conflicts as a matter of course and annually as part of the declaration process. At minimum, they should be declared before any meeting or process, such as a recruitment process, to which the conflict or potential conflict is relevant. Annual declarations by Trustees and senior staff members are published, omitting the details of family members.

### General Policy

Every person associated with TI-UK (as defined above) must avoid or manage any potential, real or perceived conflict of interest (inter alia by refraining from any work or decision making on matters subject to a potential conflict of interest), and openly acknowledge any potential or actual conflict of interest which arises through their association with TI-UK.

TI-UK's efforts to raise the ethical standards of government officials, business people and other individuals could be compromised by any ethical lapses on the part of its employees. It is essential that everyone associated with TI-UK (as defined above) be highly sensitive to potential conflicts of interest.

### How to Deal with a Possible Conflict of Interest

Potential conflicts of interest should be identified and declared by the person in potential conflict, or reported by others as soon as they become aware of such potential conflict of interest. If problems are identified before commitments are made or questionable actions have occurred, embarrassment can be avoided and alternatives can be explored.

Such disclosure or report should be made to the Chief Executive and the Chair of TI-UK's Board. If the person in potential conflict is the Chief Executive, they should disclose to the Chair of TI-UK's Board and the Chair of the TI-UK Ethics Advisory Panel.

The evaluation of a potential conflict of interest must be made by the Chief Executive and the Chair of the TI-UK Board. If the person in potential conflict is the Chief Executive, the evaluation must be made by the Chair of the TI-UK Board and the TI-UK Ethics Advisory Panel. The evaluation may determine the absence of a conflict of interest, or it may lead to the conclusion that:

- the person facing a potential conflict of interest should not go ahead with the evaluated activity, or
- they should recuse themselves from participating in work or decision-making by TI-UK with reference to the matter in conflict.

The Chief Executive is responsible for ensuring that all persons associated with TI-UK (as defined above) are made aware of the policy and procedures regarding potential conflicts of interest.

#### Annex 4: Procedure for Vetting Clients for Paid Consultancy and Advisory Services

TI-UK's Business Integrity Programme (BIP) aims to help organisations who genuinely wish to improve their anti-bribery and corruption (ABC) systems.

The vetting process for BIP to decide whether an organisation can be helped is as follows:

- If the organisation is a Business Integrity Forum (BIF) member or an organisation we have helped recently, we will already have completed a vetting process.
- For all other organisations, due diligence needs to be conducted prior to commencing any work which may include a questionnaire.

In cases of doubt, the Private Sector Engagement Committee of the TI-UK Board will be consulted.

There are a limited number of circumstances where we will not be able to help organisations. These are:

- We suspect their motivation is not genuinely to improve their ABC systems, but to use TI-UK's work for PR reasons
- The organisation has been convicted for bribery or related offences and the board/senior management have made no effort to reform its systems and cannot demonstrate an irrevocable commitment to a strong ABC policy.
- The organisation is the subject of investigation/legal proceedings for criminal offences in relation to bribery and corruption.
- The organisation is incorporated in a foreign jurisdiction where a sister TI Chapter has genuine reasons to object to TI-UK working with the organisation
- There is a conflict of interest with other TI work.

The final decision on whether BIP can help an organisation resides with the TI-UK Board, which has delegated this function to the Private Sector Engagement Committee.

Besides vetting clients, BIP also ensures that any TI-UK employee and external consultants are not conflicted when working on TI-UK projects. We expect any possibility of conflict of interest to be raised at the earliest stage.

## Anti-Bullying and Harassment Policy

Owner:	<b>People Team</b>	Status:	Approved
Last reviewed:	November 2024	Review date:	November 2026
To be read in conjunction with these other policies and procedures:		<ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• Safeguarding Policy</li> <li>• Equal Opportunities Policy</li> <li>• Grievance and Disciplinary Procedures</li> <li>• Whistle-blowing Policy</li> </ul>	

### Purpose of the document

TI-UK is an equal opportunities employer. We make good faith efforts to comply with the spirit and letter of the equality and other laws. We promote a harmonious working environment where colleagues are treated with dignity and respect.

This document sets out TI-UK's policy on anti-bullying and harassment in the workplace and the avenues of recourse for those who may feel that they are being bullied or harassed. Line managers and / or the People team should be contacted in confidence to discuss any matter of concern related to this policy.

### Definitions

TI-UK does not discriminate in its employment practices on the basis of the protected characteristics of age, disability, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation or any other legally protected category (see the Equal Opportunities Policy).protected, TI-UK as an employer is responsible for preventing harassment. This policy applies to employees, contract workers (including agency workers and those who contract to provide work personally such as consultants), interns and job applicants. Whilst volunteers are not legally protected, we shall take reasonable steps to ensure they are prevented from harassment.

**Harassment** is unwanted behaviour related to these equality grounds which damages, or has the aim of damaging, a person's dignity or of creating an intimidating, hostile, degrading, humiliating or offensive environment for that person. The effect of the unwanted behaviour means they are treated less favourably because they submitted to or rejected the unwanted conduct. Many forms of misbehaviour may amount to harassment. Examples include:

- Physical conduct such as assaulting a person or making obscene gestures.
- Verbal conduct such as making racist, sexist, sectarian or homophobic remarks; making derogatory comments about a person's age or disability.
- Visual or written material containing racist, sexist, sectarian, homophobic or other derogatory words or pictures (e.g. in posters, graffiti, letters or emails).
- Isolating a person (e.g. 'ghosting someone') or refusing to co-operate or help them at work or by excluding them from work-related social activities.
- Forcing a person to take part in religious or political activities, or deliberately disrespecting someone's religious or other belief.

## Sexual Misconduct

There are a range of forms of sexual misconduct that also constitute violations of a person's dignity and human rights, including sexual harassment, sexual assault and various forms of sexual exploitation, including sexual extortion.

**Sexual harassment**<sup>1</sup> involves unwanted behaviour of a sexual nature towards another person. This behaviour can make someone feel very uncomfortable and can adversely affect their mental health, well-being, and can create an intimidating, hostile, degrading, humiliating or offensive environment for the person who has been sexually harassed. The person who has been sexually harassed is not responsible for the harassment, the blame lies entirely with perpetrators. Sexual harassment can be perpetrated by anyone, regardless of their gender identity or sexual orientation, and is often a repeated pattern of behaviour but may also occur as one-off incidents. It includes unwanted behaviour including:

- Making inappropriate comments of a sexual nature, including commenting on someone's body (including gender reassignment)
- Sharing or displaying sexual images or other sexual content
- Making sexual gestures or noises
- Leering, staring or making suggestive looks of a sexual nature
- Asking questions about someone's sex life or other intrusive questions
- Someone discussing their own sex life
- Unwanted sexual advances or flirting
- Spreading sexual rumours
- Asking for sexual favours
- Unwanted physical contact of a sexual nature, including brushing up against someone, massaging them, hugging or kissing them. Some forms of unwanted physical contact also constitute forms of sexual assault (see below)
- Forms of sexual harassment that are also crimes, including stalking, indecent exposure, and taking a photo or video of someone under their clothing (e.g. up skirting)

**Sexual assault**<sup>2</sup> is a form of sexual violence and a criminal offence in which someone intentionally touches another person in a sexual manner without their consent, or when a person is forced or coerced into taking part in a sexual activity without their consent. Consent implies that a person has the freedom and capacity to make a choice to agree to sexual interactions, and consent can be withdrawn. A person can be coerced, pressured, manipulated, bullied, intimidated, threatened, deceived, drugged, or otherwise forced or coerced into sexual interactions that are not consensual. Sexual assault does not necessarily involve violence or physical injury, but can be a physical, psychological and/or emotional violation. The person who has been sexually assaulted is not responsible for the assault, the blame lies entirely with perpetrators. Sexual assault can be perpetrated by anyone, regardless of their gender identity or sexual orientation, and it includes a range of behaviours including:

- Unwanted kissing or hugging

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<sup>1</sup> Equality Act 2010

<sup>2</sup> Sexual Offences Act 2003

- Attempted rape
- Touching someone's body parts, including through clothing, for sexual pleasure or in a sexual manner
- Pressing up against another person
- Touching someone's clothing in a sexual manner, for instance lifting up someone's skirt
- Forcing or coercing someone to engage in sexual activity without their consent, including forcing someone to touch themselves or another person sexually.

Under UK law, some forms of forced or coercive sexual activity also constitute the statutory offence of rape, in which a person intentionally penetrates another's vagina, anus, or mouth with a penis without the other person's consent. Under UK law only a person with a penis can commit rape, but forced and coercive sexual activity can be committed by anyone regardless of gender identity or sexual orientation. Assault by penetration is also a statutory offence that involves intentional sexual penetration with a part of someone's body or anything else without consent.

**Sexual exploitation** can involve various forms of sexual harassment, assault, and other forms of sexual violence. There are different definitions for the sexual exploitation of a child<sup>3</sup>, but the 2015 Modern Slavery act defines exploitation as a range of behaviours including subjection of someone to force, threats or deception to induce them to provide sexual services of any kind.

**Sexual extortion** can be a form of sexual exploitation or sexual assault that includes coercing or forcing a person through implicit or explicit requests to engage in any form of unwanted sexual activity in corrupt transactions. The perpetrator occupies a position of authority in which they can exert influence, and which they exercise for personal gain. However, there is currently no legal definition of sexual extortion in the UK, but it may possibly be prosecuted as a form of sexual harassment or assault. Sexual extortion includes a range of circumstances and can include the request to engage in unwanted sexual activity in exchange for employment, promotion, receipt of a salary, resources necessary for survival, and basic physical protection. It can also include forced or coerced sexual exchanges to remove threat of detention, access to legal documents, provision of healthcare or other social services, and circumstances in which a person is threatened with exposure of sexual images to coerce them to provide additional sexual images, sexual favours, or money.

Sexual misconduct<sup>i</sup> can happen to anyone and be carried out by anyone, but research is clear that it is disproportionately carried out by men against women. It can be both a cause and a consequence of inequality and power differences. Protected characteristics such as race, sex, sexuality and gender can intersect to produce vulnerabilities to sexual harassment, assault, and exploitation. For example a Black woman might be targeted with racialised sexual harassment.

**Bullying** is similar to harassment in the sense that it can make an individual feel intimidated and offended. The main difference is that bullying behaviour need not be related to the equality grounds, but may be done for other reasons, such as jealousy, personal dislike, revenge or insecurity. While bullying is not specifically defined in law it may be covered by various legislation such as the Equality Act 2010, if it is linked to a protected characteristic, the Employment Rights Act 1996, especially the 'detriment', criminal or civil provisions under the Protection from Harassment Act 1998, the Human Rights Act 1998, claims for breach of an express or implied term of the employment contract

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<sup>3</sup> Sexual Offences Act 2003

Bullying can include:

Personal Insults:

- Humiliation (*in private, in meetings, and/or in front of other colleagues*)
- Personal criticism
- Demeaning comments
- Ridicule

Intimidation

- Psychological intimidation
- Threats of violence
- Mis-use of power or position (*including unjustified and excessive monitoring and/or supervision, deliberately and unfairly blocking someone from promotion or other development or advancement*)

Work related

- Withholding information (*including excluding them from meetings, communications or other work without good reason or explanation*)
- Taking away responsibilities (*with no good reason or explanation*)
- Work overload (*setting people up to fail*)
- Misrepresentation of work ownership

Social exclusion

- Isolation
- Scapegoating
- Victimisation

Normal management discussions with employees may find it necessary to provide both positive and negative feedback. Negative feedback in itself, does not constitute bullying or harassment if such criticism is based on solid evidence and if discussions are conducted in a professional and non-discriminatory manner.

## The Policy

Harassment and bullying are unlawful under UK equality laws and can damage the health, confidence, morale and performance of colleagues who are affected by it. TI-UK will not tolerate such behaviour in the workplace. Harassment and bullying may also be civil or criminal offences and may contravene health and safety law.

The law<sup>4</sup> requires TI-UK to take reasonable steps to prevent sexual harassment of workers (see definition) in the course of their employment. Both harassment and bullying are contrary to the standards of behaviour that we expect. Neither is acceptable in our workplace and will not be

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<sup>4</sup> The Worker Protection Act 2023

permitted or condoned. We will treat such behaviour as misconduct which may be subject to disciplinary action, including dismissal. Such behaviour can take place in a work situation, during any situation related to work such as at a social event with colleagues, against a colleague or other person connected to the employer outside of a work situation, including on social media, or against anyone outside of a work situation where the incident is relevant to their suitability to carry out the role. TI-UK has a grievance procedure to deal with complaints of bullying or harassment and we encourage aggrieved employees to use it. All complaints will be dealt with seriously, promptly and confidentially.

Our internal grievance procedure does not replace the right of employees to pursue complaints to an Industrial Tribunal, the Fair Employment Tribunal or to the courts. Those who wish to consider that option may obtain advice from the Equality and Human Rights Commission in relation to incidents of harassment ([www.equalityhumanrights.com](http://www.equalityhumanrights.com) telephone: 0808 800 0082), or from the Labour Relations Agency in relation to incidents of bullying ([www.lra.org.uk](http://www.lra.org.uk) telephone: 0330 055 2220).

Colleagues who make complaints in good faith, and others who give evidence or information in connection with such complaints, will not be discriminated against, harassed or bullied in retaliation for their actions.

Everyone should discourage harassment and bullying by making it clear that they find such behaviour unacceptable and by supporting colleagues who suffer such treatment. Any colleague who is aware of any incidence of harassment or bullying should alert a manager. TI-UK has a Whistle-blowing Policy which may also be used to raise such issues.

TI-UK will not tolerate any harassment, victimisation or retaliation of those involved in reporting incidents or those participating in associated investigations. Forms of retaliation can include defamatory comments, creating a hostile or intimidating work environment, informal pressures, exclusion from work decisions/ events and / or social events etc. Those found to have engaged in retaliation will have appropriate action taken including as a serious disciplinary offence under the grievance and disciplinary procedure. Colleagues who witness retaliation should report this immediately to the People Team.

## Responsibilities

In line with TI-UK's commitment to creating a safe working environment and one which strives to create positive working relationships, all colleagues are expected to observe the following minimum standards of behaviour, including:

- Being polite and courteous to others;
- Being respectful of the differences between people, their circumstances and their opinions;
- Ensuring they do not engage in any bullying or harassing behaviour(s) towards others in, or connected with, the workplace;
- Ensuring they do not assist, or encourage others in the workplace, or in connection with the workplace, to engage in bullying or harassment of any type, including sexual harassment and sexual assault;
- Adhering to the grievance procedure if they experience any bullying behaviour(s) or harassment personally;
- Reporting any bullying behaviour(s) or harassment they see happening to others in the workplace, or connected with the workplace;
- Keeping information confidential if involved in any investigation.



- Positively participating in induction, refresher training and awareness raising in order to promote a healthy workplace and Freedom to Speak Up culture.

In addition, managers bear some particular responsibilities:

- They are responsible for modelling behaviour that fosters a safe and healthy working environment free from bullying, discrimination and harassment.
- Managers who receive reports of alleged bullying or harassment must respond in accordance with the procedures;
- Managers may be required to investigate allegations of bullying or harassment in line with the grievance or other procedures.

### Third Party Complaints

TI-UK will not tolerate harassment by a third party (someone who does not work for TI-UK). Such complaints will be dealt with seriously, promptly and confidentially. Remedies may include TI-UK referring the matter to the relevant complaints mechanism or taking other appropriate action to prevent reoccurrence.

### Monitoring

TI-UK has a designated Safeguarding Officer who will oversee investigation of any breaches of this policy; report them to relevant authorities where appropriate; and ensure a log of such incidents is maintained. This will normally be the Chief Operating Officer. They will also take such other steps as are necessary to routinely monitor compliance, including reviewing any incidents with a view to changes in policy or procedures and periodically considering scenarios relevant to the work of TI-UK and the risks they present. They will report regularly to the TI-UK Board.

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<sup>i</sup> sexual assault, sexual harassment, stalking, voyeurism and any other conduct of a sexual nature that is non-consensual or has the purpose or effect of threatening, intimidating, undermining, humiliating or coercing a person

## Anti-Fraud Policy

Owner:	<b>Chief Operating Officer</b>	Status:	Approved
Last reviewed:	November 2024	Review date:	November 2025
To be read in conjunction with these other policies and procedures:	<ul style="list-style-type: none"><li>• Anti-Bribery Policy</li><li>• Whistle-blowing Policy</li></ul>		

### Purpose of the document

This document outlines TI-UK's policy against fraud and sets out our responsibilities for its prevention. It also outlines the action to be taken where employee's discover or suspect fraud.

The TI-S Plain Language Guide defines fraud as: 'The offence of intentionally deceiving someone in order to gain an unfair or illegal advantage (financial, political or otherwise). Countries consider such offences to be criminal or a violation of civil law.'

The term is used to describe a whole range of activities such as deception, forgery, extortion, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts and collusion. Generally, however, fraud involves the intention to deceive a person or organisation in order to obtain an advantage, avoid an obligation or cause loss.

The term also includes the use of information technology equipment to manipulate programs or data dishonestly and the intentional misuse of computer time and resources including cyber-crime.

This policy contributes to measures aimed to prevent financial crime which include bribery and corruption (*Bribery Act 2010*), Money Laundering (*Charities Act 2011, Money Laundering Regulations 2017*), Terrorism (*Terrorism Act 2000 and Proceeds of Crime Act 2002*); Economic Crime (*Transparency & Enforcement Acts 2022 & 2023*) and Sanctions (*various including UK, EU, UN, USA sanctions regulations*).

### The Policy

"We will act with integrity" is one of the core TI-UK organisational and strategic values. A culture that demonstrates this to be purposeful and lived is reflected in policies and procedures and with expectations as to the behaviours of those who work for and with TI-UK.

TI-UK requires employees at all times to act honestly and with integrity and to safeguard the resources for which they are responsible. Fraud is a threat to these resources and hence must be a concern of all.

TI-UK takes the most serious view of any attempt to commit fraud by employees, partners, contractors, consultants and others acting on behalf of TI-UK. Employees involved in impropriety of any kind will be subject to disciplinary action, including prosecution, where appropriate. Attempted fraud will be treated as seriously as accomplished fraud.

The Board of Trustees are responsible for managing funds and keeping them safe (*The Essential Trustee: What you need to know, what you need to do, UK Charity Commission*). Trustees are responsible for ensuring effective processes for handling money, to help avoid poor decisions and

accidental errors, as well as theft and fraud. Protecting the charity from financial crime such as theft and fraud, putting appropriate safeguards in place for money, assets and people where the charity operates outside of the U.K., and having robust and effective financial controls in place. Cyber security is a key element of protecting TI-UK funds and systems from on-line fraudulent activity and colleagues are expected to be alert to and report such attempted frauds. Serious Incident Reports are required to be submitted for frauds, thefts and other significant financial losses with Annual Confirmation that this has occurred.

The Chief Executive is responsible to the Trustees for:

- undertaking a regular review of the fraud risks associated with TI-UK;
- maintaining an effective anti-fraud response plan, in proportion to the level of fraud risk identified.
- developing and maintaining effective controls to help prevent or detect fraud;
- reporting incidents of fraud or attempted fraud to the Board of Trustees to allow reporting to the Charity Commission as Serious Incident Reports and to funders in line with their established procedures;
- carrying out vigorous and prompt investigations if fraud occurs (this responsibility will usually be delegated to the Chief Operating Officer);
- taking appropriate disciplinary and/or legal action against perpetrators of fraud;
- taking disciplinary action against managers where their failures have contributed to the commission of the fraud;
- ensuring that appropriate action is taken to minimise the risk of previous frauds occurring in future;
- ensuring that all employees are aware of the Anti-Fraud Policy and know what their responsibilities are in relation to combating fraud with training and induction being provided as necessary.

Line managers, project managers and budget holders are responsible for the prevention and detection of fraud by ensuring that an adequate system of internal control exists within their areas of responsibility, and these controls operate effectively. As a result there is a need for all managers to:

- identify and assess the risks involved in the operations for which they are responsible;
- monitor for the existence of effective controls to prevent and detect fraud;
- ensure compliance with controls developed by TI-UK; and
- ensure that agreed procedures are followed.

Every employee:

- has a duty to ensure that public funds, donor funds, TI-UK's reputation and its assets are safeguarded;
- should alert their line manager where they believe the opportunity for fraud exists because of poor procedures or lack of effective supervision, and to escalate this to the Chief Operating Officer or Chief Executive where concerns persist.
- has a responsibility to report details of any suspected or actual fraud (including cyber security threats), or any suspicious acts or events, to their line manager, head of department or the

Chief Operating Officer. If these channels are not effective then the Chief Executive or Chair of the Board are alternative reporting routes.

- must assist in any investigations by making available all relevant information and by cooperating in interviews.

Alternatively, employees may follow the TI-UK Whistleblowing Policy to raise any concerns.

### Fraud by partners and contractors

TI-UK's project partners (including other TI Chapters) and contractors (including consultants) may be responsible for managing significant funds or other assets for which TI-UK is accountable – either under statutory legislation or in relation to donor contracts. They may also operate under different legal jurisdictions.

In these cases, a contract must be signed between the respective parties which covers, inter alia:

- provision for the investigation of any alleged fraud by either party
- the rights of each party to cancel the contract if fraud is demonstrated to have occurred
- the rights of each party to take legal action to recover funds or assets fraudulently taken
- clarifies the legal jurisdiction under which the contract operates.

TI-UK will, from time to time, develop standard sub-contracting templates to cover these and other issues including financial crime risks related to bribery & corruption, money laundering, terrorism and sanctions. When new partners are engaged that are not TI-Chapters, a risk based approach will be undertaken to document checks made to ensure we are aware of who we are dealing with, who controls them and their sources of funds.

### Responses

TI-UK will investigate any credible allegations of fraud using internal or, if necessary, external resources to do so. Commissioning that investigation will be the responsibility of the Chief Operating Officer or, if they are in any way implicated in the allegations, of the Chief Executive. TI-UK will not tolerate any harassment or victimisation of those making such allegations or taking part in investigations (including informal pressures, isolation etc.) and will take appropriate action to protect those in the workplace who raise a concern in good faith. This will be treated as a serious disciplinary offence under the grievance and disciplinary procedure or the anti-bullying & harassment policy.

Investigations will be concluded as rapidly as is possible without compromising their integrity or thoroughness.

In the event that reporting to the Chief Executive and / or Chief Operating Officer is either not effective or appropriate, whistle-blowing can be channelled through the Chair of the Board who may choose to refer it to the Ethics Advisory Panel Chair. Alternatively, employees may contact the Ethics Advisory Panel in confidence ([Ethics@transparency.org.uk](mailto:Ethics@transparency.org.uk)).

Should the allegations be proven, TI-UK may take any or all of the following actions:

- disciplinary action up to and including gross misconduct leading directly to dismissal;
- reporting the incident to the police or other authorities in relevant countries;
- legal action to recover lost assets.

All investigations, whatever their outcome, will be logged and reported to the Board. Where required, reports will also be made to the Charity Commission through Serious Incident Reporting. Requirements to report to donors will be followed in a timely manner and in line with funding agreements.

TI-UK encourages all employees to report details immediately if they suspect that a fraud has been committed or see any suspicious acts or events. Malicious accusations may be the subject of disciplinary action.

#### **Review**

This policy is reviewed on an annual basis by the Finance, Risk and Audit Committee as part of their annual fraud risk assessment.

## Blended Working Policy

Owner:	<b>People Team</b>	Status:	<b>Approved</b>
Last updated:	November 2023	Review date:	November 2025
To be read in conjunction with these other policies and procedures:		<ul style="list-style-type: none"><li>• Delivering Blended Working Guidance</li><li>• Flexible Working Policy</li><li>• Leave Policy</li><li>• Wellbeing Guidance</li></ul>	

### Purpose of the document

This policy sets out TI-UK's approach to blended working (*mixture of remote/home based working with in-person meetings*). The aim is to be clear on expectations without setting out a prescriptive set of rules that detract from ensuring that everyone at TI-UK contributes to a high performing, collaborative, efficient and effective workplace. This places trust at the centre of our culture. However individual lifestyle choices can detract from a spirit of fairness and collegiality and so policy in addition to guidance is in place to provide reference points.

Whilst flexible working arrangements are protected in law, blended working is not. Colleagues can make applications for flexible working in line with TI-UK policy.

### The Policy

TI-UK operate blended working based on the Principles outlined. The amount of in-person meeting is determined by the needs of the role and not the preferences of the post holder. Where the performance of a post-holder and / or their team is impacted negatively by lack of in-person meeting, we reserve the right to request changes (temporary and / or permanent) to ways of working in order to address this. Refusal to follow the Principles could be a disciplinary matter.

### The Principles

TI-UK recognises that the locations where we perform our work activities can vary and the spaces where we function change. Whilst this can be a positive enhancement for us individually, it can lead to unintended consequences for others.

In-person meeting should always be driven by purpose rather than pattern. This includes:

- **Structured team collaboration** – retaining the value of in-person interaction, the creativity and efficiencies it affords us. Colleagues are required to be present for such sessions at least a few days a month but possibly more frequently, recognising that teams have diverse tasks and projects and that these vary over time. Every quarter a mandatory in-person team event for all TI-UK employees takes place to promote organisational development and learning.
- **Management supervision** – one-to-one meetings with supervisors, still blended with virtual meetings where effective, but ensuring that appraisals (full and half year) are in-person.
- **Induction of new colleagues** - ensuring that new colleagues meet their team in person and as many other colleagues face-to-face during their first few weeks with us. The compulsory TI-UK two half days induction are also held in-person.
- **Informal collaboration/development/learning** – encouraging colleagues to use meeting and office space to build their sense of community at work, lunch together with different teams, and to promote horizontal and vertical learning that comes from interacting with a range of both junior and senior colleagues across the board.

- **Personal preference:** different colleagues prefer to work in an office environment to home/other venues with some using the office as their primary location whilst others may benefit from a more varied approach.
- **Hosting guests/partner organisations** and recognising that they may prefer to meet in person rather than virtually.
- **Attending in-person events:** the need to be available for in-person events organised by TI-UK or with external organisations/ partners etc.

## The Needs of the Role

TI-UK assesses each role individually in terms of the amount of in-person meeting that may be required. This highlights to post-holders the possible expectations that could be placed upon them internally and externally. Those in more senior positions, leading and managing teams or with significant amounts of external representation may require more in-person collaboration time and to recognise that this can be subject to change across the cycle of TI-UK business as well as dealing with specific issues/ opportunities.

- **Weekly Flexibility**– you may need to adapt your diary and availability at short notice in order to be available in-person. We would envisage you have a week’s notice provided to allow you time to arrange this.
- **Fortnightly Flexibility** – whilst you will generally be able to plan your workload and diary, there may be occasions where increased flexibility is required. We would envisage you have two weeks’ notice provided to allow you to arrange this.
- **Monthly Flexibility** – you should be able to predict throughout the year the times when you will be required to meet in-person. We would envisage you have three / four weeks’ notice provided to allow you to arrange this.

## Location of the Role

Roles by default have a Central London office location specified. Where the purpose of a role requires this to be located in a different part of the United Kingdom this will be specified in the approved job description. Any requests by individual post holders to change location of job roles must be backed by a business case and any changes would only be agreed on this basis and reflected permanently in the job description. The People Team will review and recommend any changes of role locations to the Senior Leadership Team for approval.

## Core Hours

TI-UK’s standard hours are 35 per week (plus one hour per day for lunch; a minimum of 30 minutes is required) with our core hours of 10.00-16.00 where colleagues are expected to be routinely available whether at the contracted office location, home office or external engagements. Core hours act as a spine for the working day allowing for deep work without distractions, meetings (in-person and remote) and maximising opportunities for connection and socialising. They also help us remain efficient when it comes to diary management, organising events etc. along with individual commitments outside of work during the normal working day. Your supervisor and team will need to understand your arrangements with visibility via digital calendars.

## Recruitment

TI-UK set out the approach to blended working on the TI-UK recruitment area of the website. We consider our highly flexible approach to be one of the benefits provided to employees. Whilst new joiners may wish to take forward ways of working they have followed with previous employers it is important the candidates take into account TI-UK's approach and the needs and requirements of the job role and the team they are joining. Where transition periods to accommodate changes on joining TI-UK are required these should be discussed as part of the appointment process with decisions being taken by the People Team where necessary.

## Occasional Changes

TI-UK recognises that there may be situations in which short term changes to the frequency of in-person meeting may occur. The policy aims to provide flexibility and adaptability for line managers to approve such temporary adjustments. Consideration of any negative impact on the organisation and meeting business needs should be demonstrated. All such requests should be treated fairly and equitably by line managers.

## Availability of TI-UK Working Space

Space to accommodate everyone at individual desks is not possible every day. Those with more challenging home working circumstances will be prioritised to have desk space provided (the People Team can be contacted to discuss these confidentially). The needs of individual teams to have space to meet up on specific days with the benefits we enjoy as a small team from informal collaboration/learning and development will be balanced.

Where roles have to be located outside of the main office in Central London alternative hot-desking arrangements will be put in place.

## Home Working Costs

TI-UK will not meet the running costs of home / remote working, e.g. heating, lighting, internet etc.

Where home working adaptations are required these should be requested through the People Team.

TI-UK are unable (due to tax implications) to reimburse costs associated with travel from home to the permanent work location outlined in employee contracts (e.g. Central London). Travel costs to other office locations (from where your role is contracted to be performed) or external meeting/event venues for work purposes will be treated as a work expense as they are deemed to be self-contained and the purpose of each visit is temporary.

## Remote Working outside of the UK

TI-UK does not allow an employee with a UK contract to be based either permanently or temporarily outside of the UK. This is due to tax and health and safety considerations that TI-UK is not resourced to consider on a case-by-case basis. The leave policy provides for short term working from overseas arrangements.

Where an employee wishes to be based outside of the UK they can request moving to a consultancy contract. Continuity of employment ends with such an arrangement. Moving to such contracts must be approved by the relevant SLT Director following consultation with the People Team.



## Changes to Blended Working arrangements

Best practice and approaches to blended working continue to evolve and modifications and changes to this policy may be required in future. Where significant changes are proposed, consultation feedback and the timescales to effectively implement will be communicated in order to allow colleagues to adapt and plan accordingly. A minimum three month notice period will be provided (*except in exceptional cases*).

The selection of suitable office space for a charity based in central London takes into consideration effective use, transport links, environmental impact considerations and value for money/ affordability. Decisions on changes to the office location will be communicated in a timely manner. A minimum one month notice period will be provided (*except in exceptional cases*).

## Bring Your Own Device Policy (BYOD Policy)

Owner:	<b>Chief Operating Officer</b>	Status:	<b>Approved</b>
Last reviewed:	September 2024	Review date:	September 2026
To be read in conjunction with these other policies and procedures:	<ul style="list-style-type: none"><li>• Data Protection &amp; Privacy Policy</li><li>• Departure Policy</li><li>• Grievance and Disciplinary Policy</li><li>• Telecommunications Policy</li></ul>		

### Introduction

TI-UK recognises that employees<sup>1</sup> will often wish to use their own technology devices (which may include but not be limited to laptops, smartphones and tablets) to carry out their work-related functions. Advantages include familiarity with the devices, trouble saved from carrying both work and personal devices and the ability to support flexible and remote working patterns together with business trips. It also is recognised to minimise overheads which are important to us as a charitable entity.

The Bring Your Own Device policy recognises the risks related to accessing TI-UK data and technology infrastructure through personal devices. The steps set out in this policy are intended to protect the security and integrity of TI-UK's data and technology infrastructure. They also ensure that TI-UK as a data controller can demonstrate that they have taken measures against unauthorised or unlawful processing of personal data. TI-UK employees must ensure they are familiar with the requirements of this policy when utilising new devices for the first time, the on-going updating and security risks of existing devices as well as what is required where devices have been lost/ stolen or they leave the employment of TI-UK.

Employees agree to the terms and conditions set forth in this policy in order to be able to connect their devices to the company network. Limited exceptions to the policy may be granted for issues arising from variations in devices and platforms that can occur with technology availability/ updates and these exceptions must be approved by the Owner of this policy. Any exceptions must be compliant with the principles of Cyber Essentials Plus Accreditation. TI-UK reserves the right to revoke this privilege if users do not abide by the policies and procedures outlined below and to disconnect devices or disable services without prior notification. TI-UK reserves the right to take appropriate disciplinary action up to and including termination for noncompliance with this policy.

### Access to the TI-UK Data Network

Access to TI-UK data using personal devices will only be permitted through use of the Microsoft Intune app. Users will be required to install the Microsoft Intune Company Portal app and sign into their TI-

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<sup>1</sup> This policy also applies to interns, secondees, consultants and Trustees and other volunteer roles where access to TI-UK data and technology platforms has been granted.

UK account to enrol their phone with TI-UKs BYOD policy. Minimising the number of external devices that have full access to TI-UKs data network provides greater protection to TI-UK.

## Devices and Support

The risk that unsupported or out-of-date devices allow for exploitation of known security vulnerabilities requires minimum operating platforms across device options. These help ensure that the latest security mitigations are present and that products are receiving security updates that address new threats. This is particularly important in order to avoid malware exploiting remotely-accessible vulnerabilities leading to catastrophic impacts across the entire TI-UK organisation.

- Smartphones, Tablets and Laptops including iPhone, Android, Mac and Windows are allowed, provided they are still supported by the manufacturer:
  - Apple iOS 15 or later
  - Android OS 12 or later
  - Windows 10 or later
  - macOS 12 or later
- Any brands or particular device models deemed to be compromised must be avoided for TI-UK related activity.
- Employees should contact the device manufacturer or their carrier for operating system or hardware-related issues, TI-UK's external IT support team will be unable to provide assistance for support related to the device itself. Security

In order to protect unauthorised access and prevent data loss:

- Devices must be password protected using the features of the device and a strong password is required to access TI-UK data. The TI-UK's strong password policy is: Passwords must be at least six characters and a combination of upper- and lower-case letters, numbers and symbols.
- The device must lock itself with a password or PIN if it's idle for two minutes. This password for unlocking the device should be different to the password to access TI-UK's network.
- Multifactor authentication is required in order to access TI-UK data.
- Rooted (Android) or jailbroken (iOS) devices<sup>2</sup> are strictly forbidden from accessing company data.
- Employees are prevented from downloading and installing their own apps on their TI-UK laptop and must request for apps to be downloaded by Penelope/IT Team. This is to ensure that risks of consenting access to apps does not lead to malicious application data leaks.
- Employees' access to data is limited based on defined user profiles and automatically enforced.
- The Intune app and any TI-UK data it may contain must be remotely wiped from the employees device in the event of the device being lost, or Penelope/ IT detects a data or policy breach, a virus or similar threat to the security of the company's data and technology infrastructure.

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<sup>2</sup> Jailbroken or rooted devices are modified devices that have had restrictions imposed by the manufacturer or operator removed and hence are more susceptible to malware as a result of disabled security features. This process also nullifies warranties.

No sensitive or personal TI-UK data should be saved on personal devices or their back-up platforms. Employees are required to co-operate with data requests and provide evidence where deletion of these from personal devices are required.

### Stolen Devices

Stolen devices can pose a risk to TI-UK's data. We encourage employees to obtain advice on this as soon as possible where they have concerns.

- Lost or stolen devices must be reported to TI-UK within 24 hours. Employees are responsible for notifying their mobile carrier immediately upon loss of a device. On receipt of this notification, all access to TI-UK data via the Intune app will be immediately withdrawn remotely from the lost or stolen device by Penelope, TI-UK's IT support providers.

### End of Employment

- At the end of employment with TI-UK, users are required to remove from their personal devices all materials related to TI-UK including back-up storage and confirmation in writing that this has occurred will be obtained as part of the departure process. Access to TI-UK data via the Intune app will be removed from personal devices remotely by Penelope, TI-UK's IT support providers.

### Liabilities/Disclaimers

The employee assumes full liability for risks including, but not limited to, the partial or complete loss of their personal data due to an operating system crash, errors, bugs, viruses, malware, and/or other software or hardware failures, or programming errors that render the device unusable. It is the employee's responsibility to take additional precautions, including adequate device back up should such an event occur that is linked to accessing the TI-UK platforms.

### Acceptable Use

TI-UK applies the same expectations on acceptable conduct whilst undertaking business activities on personal devices. Disciplinary action may be taken where TI-UK platforms have been used for inappropriate, illegal or illicit purposes. Please refer to the Grievance and Disciplinary Policy. Employees are blocked from accessing certain websites while using TI-UK supplied devices at the discretion of TI-UK.

- TI-UK has a zero-tolerance for texting, emailing, attending virtual meetings or calling while driving.

### Reimbursement

The employee is personally liable for all costs associated with the purchase, maintenance, replacement and operation of their personal devices.

### Security Collaboration

This policy is intended to support employees to undertake their TI-UK roles and functions as effectively as possible. We encourage users to participate in training and to report security concerns and incidents so that we can learn and better protect the organisation going forward.

## Annex: Specific Device Guidance

### Devices and Support

Devices that access company information must be fully up to date and run an operating system that is still supported by the supplier. You can ensure that your device is updated automatically by following these instructions:

<a href="#">Windows</a>	<a href="#">Mac</a>	<a href="#">Android</a>	<a href="#">iPhone</a>	
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### Security

Devices that you use to access company information must be password protected, you can turn on password protection by following these instructions:

<a href="#">Windows</a>	<a href="#">Mac</a>	<a href="#">Android</a>	<a href="#">iPhone</a>	
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You should also set your device to require a password on going idle.

<a href="#">Windows</a>	<a href="#">Mac</a>	<a href="#">Android</a>	<a href="#">iPhone</a>	
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### Access to TI-UK Network

Requests for non TI-UK employees such as consultants to access TI data and Sharepoint must be made to Penelope and will be granted subject to the consultant agreeing to any applicable security measures put in place to protect our network, including Microsoft Intune.

<https://learn.microsoft.com/en-us/mem/intune/fundamentals/what-is-intune>.

In specific cases we may also mutually agree with a TI-UK employee that use of such applicable measures are required in order for them to continue to access data on their own devices. Reasons for this could include the sensitivity of the data they handle, attempts to hack the systems using their credentials, poor IT security behaviour etc.

## Capability Policy and Procedures

Owner:	<b>People Team</b>	Status:	Approved
Last reviewed:	February 2023	Review date:	February 2024
To be read in conjunction with these other policies and procedures:		<ul style="list-style-type: none"> <li>• Grievance and Disciplinary Policy</li> <li>• Sick Leave Policy</li> <li>• Flexible Working Policy</li> <li>• Leave Policy</li> <li>• Redeployment Guidelines</li> </ul>	

### Policy statement / purpose

1. According to the Employment Rights Act of 1996, an employee's capability means, their capability assessed by reference to skill, aptitude, health or any other physical or mental quality. Capability, is defined as the capacity of an employee to successfully carry out the responsibilities that are associated with their role.
2. Lack of capability or loss of capability can arise for various reasons. Examples are:
  - i. Promotion beyond ability
  - ii. Appointment to a job role that is inappropriate for the individual's skills or experience
  - iii. Change resulting from physical or mental ill-health (acquired disability)
  - iv. Development in job demands over the years or changes brought about by outside influences, such as new technology, new work methods or legislation.
3. The Capability Procedures has been drawn up to identify the reasons for unsatisfactory work performance/attendance. It sets out how to approach, consider and manage cases of incapability. There are two different approaches depending on whether the matter is considered to be unsatisfactory performance or ill health incapability.

The aim is to:

- i. Help and encourage employees to achieve and maintain a high level of performance.
- ii. Help and encourage employees to achieve and maintain a high level of attendance.
- iii. Indicate to an employee that their current standard of work/attendance is not at an acceptable level.
- iv. Provide the reasonable level of training and support to enable the employee to achieve the desired level of performance/attendance and/or reasonable level of adjustment.
- v. Provide a framework to enable employees to be treated fairly and consistently.

- vi. Set out the procedures to be followed when an employee is not able to successfully carry out the full responsibilities of their role.

## Selecting the Appropriate Policy & Procedure

- 4. The Capability Policy and procedure addresses underperformance where this appears to be due to an employee's ability to do their job rather than conduct, i.e. the employee 'can't do' rather than 'won't do' something.
  - i. In selecting whether to use the Capability or Grievance & Disciplinary policy and procedures consideration will be given as to whether it is deliberate failure on the part of the employee to perform to the standards they are capable of and a case of conduct or whether the employee is lacking in skill, knowledge or ability, which is outside of their control, and so the job is not performed to the standard required, a case of capability.
  - ii. In deciding whether the Capability or Sick Leave policy will apply, consideration is given as to how ill health is affecting the employee's ability to carry out their job to the standard required. Where the issue is unacceptable levels of absence, the Sick Leave policy will apply.
  - iii. If the employee is attending work but their performance or work is affected due to ill health, the Capability policy will apply.

When deciding which policy applies managers are requested to seek guidance and advice from the People Team. In addition prior to implementing the formal stages of the procedure the People Team should be consulted.

## Principles

- 5. The primary objective should be to help employees to improve to the standard necessary. Only if discussions, training, counselling and warnings fail to produce the desired improvement should formal action for lack of capability be considered.
  - i. Concerns about performance should be raised with employees in a timely way to avoid complexities down the line.
  - ii. An employee who has passed probation will not be dismissed on grounds of capability without application of this procedure.
  - iii. At every step in the procedure, employees will be treated fairly, be advised of the nature of the shortcomings and will be given the opportunity to state their views before any decision is made.
  - iv. There may be exceptional circumstances, where it can be clearly demonstrated that there is no possibility that the employee can achieve acceptable levels of performance, or where the lack of capability creates an immediate danger to others. In this case TI-UK might proceed immediately to formal action.

- v. This procedure may be implemented at any stage if the employee's alleged incapability is so serious as to warrant such action. For example, this may mean that after a formal warning has expired and performance reverts to being unsatisfactory shortly afterwards, the line manager may invoke the next stage in this procedure rather than repeating a stage.
- vi. At all formal steps of the capability procedure, employees will have the right to be accompanied by a TI-UK work colleague or a trade union representative.

## Responsibilities

### Line Managers

- 6. It is the responsibility of directors and line managers to ensure that:
  - i. employees are clearly informed of the requirements of their job
  - ii. proper standards of work performance / attendance are achieved by the employees for whom they are responsible
  - iii. appropriate training and development opportunities are identified and provided
  - iv. decisions are made in accordance with this procedure.

### Employees

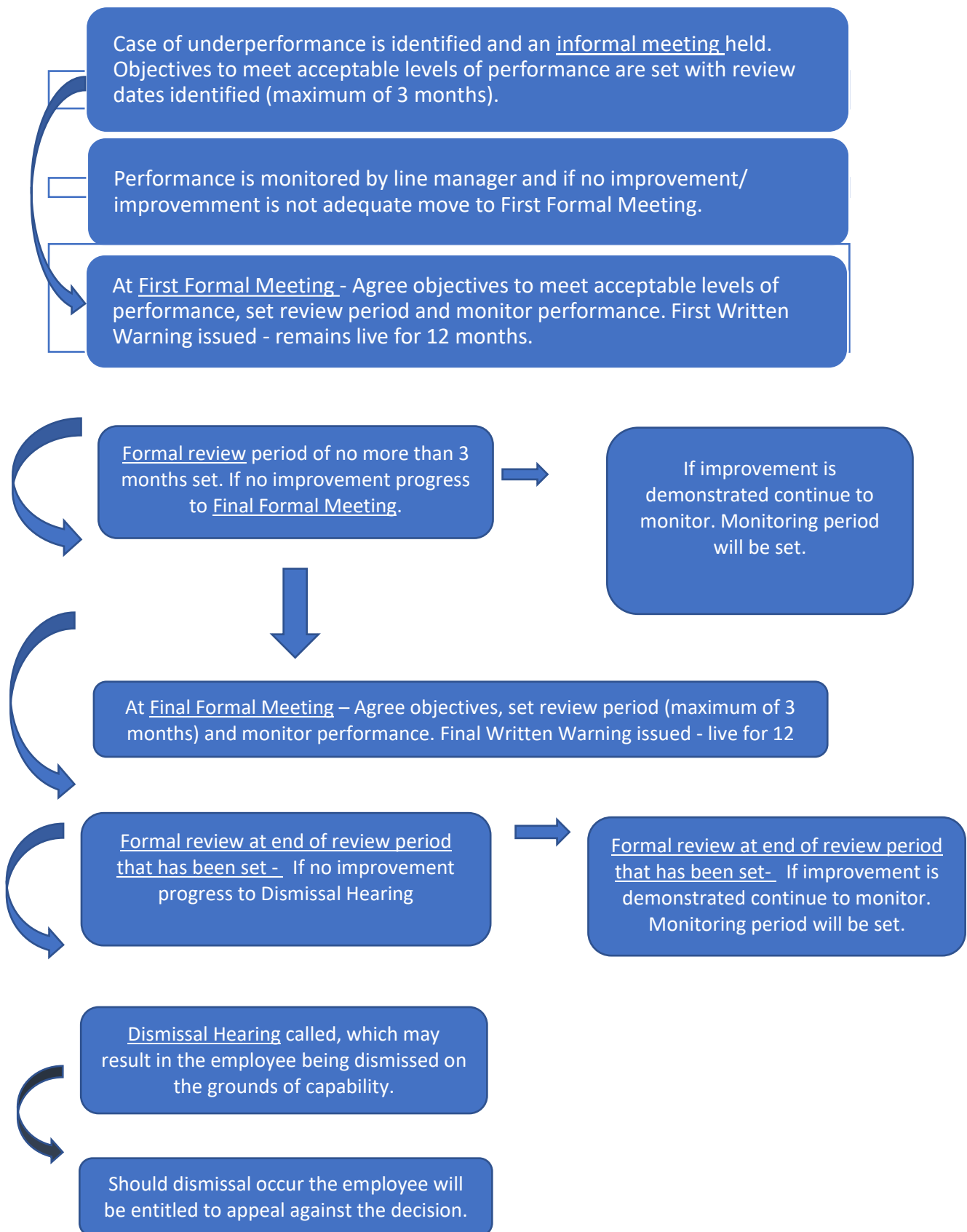
- 7. It is the responsibility of an employee to ensure that they:
  - i. are aware of the requirements of their job
  - ii. undertake any reasonable training and development that will enable them to reach the required level of performance.
  - iii. actively engage in discussions in relation to capability and / or performance issues.

## Application

- 8. These procedures are applicable to all TI-UK employees who have successfully completed their probation period. Where unsatisfactory performance or attendance occurs within the probation period, the probation period may be extended for up to three months to allow for reasonable adjustments if it is deemed this will resolve the situation.



## Capability Procedure Flow Chart – Unsatisfactory Performance



### III Health Incapability Procedure

9. Where a level of absence is due to ill health (mental / physical), or the nature of the illness, affects an employee's ability to carry out their duties it is regarded as an ill health capability matter. This includes, persistent short- term absences and long-term ill health issues. All ill health capability matters should be carried out in accordance with this procedure.

#### Reasonable Adjustments

10. **Disability** has a legal definition - a physical, mental or sensory impairment which has a **substantial** or **long-term** adverse effect on a person's ability to carry out normal day-to-day activities.

- 'substantial' is more than minor or trivial, e.g. it takes much longer than it usually would to complete a daily task like getting dressed
- 'long-term' means 12 months or more, e.g. a breathing condition that develops as a result of a lung infection

11. Each case will be individually considered when applying the definitions to ensure that specific sensitivities have been understood. Where lack of capability or loss of capability results from physical or mental ill-health (acquired disability) reasonable adjustments may initially be offered where possible such as:

- i. Providing specific specialist equipment
- ii. Adjustments to working hours for up to three months
- iii. Adjustments to duties and responsibilities for up to six months
- iv. A phased return (where an employee is returning from long term sickness absence) of up to three months)
- v. Blended working (e.g. where further adjustments to the blended working arrangements are required to limit the number of days spent in the office)
- vi. Flexible working
- vii. Redeployment to another role

12. Consideration would be given to whether any adjustments should be on a fixed term or permanent basis.

13. **Reasonable adjustments** should be informed:

- i. By contacting the employee's GP (with the employee's permission), for a report on their illness and their recommendations in relation to working and where relevant a prognosis on their illness.
- ii. By referring the employee to an occupational health provider and obtaining their permission for the report to be made available to TI-UK.

14. **Termination of employment** on the grounds of ill health occurs:

- i. where it has not been possible to make reasonable adjustments

- ii. where the adjustments are not sustainable for TI-UK in the long term
- iii. where the adjustments do not offer a permanent solution
- iv. where it has also been deemed that reasonable time and efforts have been made to support the employee to return to work or to their full contracted hours.

### Capability Procedure Flow Chart – Ill Health Capability

#### Stage 1 – Formal Capability Meeting

15. Where reasonable adjustments to date do not appear to provide a desired outcome the employee will be invited to a Stage 1 Formal Capability Meeting.

At the meeting:

The manager will discuss:

- the ill health absences or issues that are of concern
- occupational health referral and or GP referral (where this has not yet occurred or where a follow up referral is required)
- the occupational health or GP report and implications for TI-UK and for the employee
- what more could be done to support the employee
- next steps if there is no improvement

The employee will:

- be given opportunity to comment
- discuss any issues affecting their ill health absences or capability
- discuss any relevant medical information
- state what further support they think TI-UK could provide

Outcome of the meeting:

- Existing arrangements to remain in place where it is considered this could lead to an improvement (maximum of three months)
- Where the prognosis is uncertain and there is no reasonable likelihood that the employee's health will allow them to satisfactorily perform their role or to work their full contractual hours they will be invited to Stage 2 - Capability Hearing where options about their employment will be discussed

#### Stage 2 – Capability Hearing

16. If the outcome of stage one is to proceed to stage 2 the employee will be required to attend a Capability hearing where options about their employment will be discussed. The employee will be allowed to be accompanied at this meeting by a TI-UK work

colleague or trade union official and a representative from the People Team will also be present. Where the employee has concerns related to sharing sensitive details of their health, this should be discussed with the People team in advance.

Depending on their particular situation the employee may be asked to consider the following options:

- Permanent reduction in contractual hours
- Redeployment (where possible) to an alternative role that will accommodate the constraints of their health
- Termination of employment on grounds of capability

### Stage 3 - Capability Termination or Ill Health Retirement

17. If the outcome of stage 2 is to proceed to stage 3 the employee will be required to attend a Capability termination hearing where the ending of their employment will be discussed. The employee will be allowed to be accompanied at this meeting by a TI-UK work colleague or trade union official and a representative from the People Team will also be present.

Outcome of the hearing will be either:

- Termination of employment on grounds of capability
- Retirement on the grounds of Ill-health

### Appeal

18. Employees notified of termination on grounds of capability/ill health retirement shall be advised of their right to appeal against the decision. Appeals must be submitted to the Chief Operating Officer (COO) within five working days of receipt of final notice of termination. The COO will send the employee a letter acknowledging receipt of the appeal and a follow-up letter containing details of the date, time, place and other particulars about the appeal hearing. In most cases, a panel to hear the appeal will be convened within 10 days of receipt of the appeal letter. The panel will normally consist of the COO, and one other member of the SLT. The line manager/ and or Director may be invited to attend to answer questions. The employee has a right to be accompanied to the hearing by a TI UK work colleague or trade union representative / official. A People team representative will be in attendance.

19. Appeals will consider if:
- I. reasonable adjustments have been made (ill health capability)
  - II. if there is any further reasonable adjustment that could be made (ill health capability)
  - III. the capability procedure has been adhered to and been fairly implemented

The decision of the appeal panel will be final and will be communicated in writing.

## TI-UK Code of Conduct: Employees

### Purpose of the document

This Code of Conduct applies to all employees, Board members, volunteers, interns and consultants working for Transparency International UK (TI-UK). It constitutes a personal undertaking to standards of behaviour and will be included in all contracts of employment.

Nothing in this document should be taken as restricting anyone's right to engage in legitimate political activity. However, it is incumbent on all signatories to declare any conflicts of interest that may arise.

### Transparency International's Principles

Transparency International is a civil society organization committed to respecting the following principles:

1. As coalition builders, we will work cooperatively with all individuals and groups, with for profit and not for profit corporations and organizations, and with governments and international bodies committed to the fight against corruption, subject only to the policies and priorities set by our governing bodies.
2. We undertake to be open, honest and accountable in our relationships with everyone we work with and with each other.
3. We will be democratic, politically non-partisan and non-sectarian in our work.
4. We will condemn bribery and corruption vigorously and courageously wherever it has been reliably identified.
5. The positions we take will be based on sound, objective and professional analysis and high standards of research.
6. We will only accept funding that does not compromise our ability to address issues freely, thoroughly and objectively.
7. We will provide accurate and timely reports of our activities to our stakeholders.
8. We will respect and encourage respect for fundamental rights and freedoms.
9. We are committed to building, working with and working through National Chapters worldwide.
10. We will strive for balanced and diverse representation on our governing bodies.
11. As one global movement, we stand in solidarity with each other and we will not act in ways that may adversely affect other Chapters or the TI movement as a whole.

### Personal Commitment

During my time with TI-UK, I commit myself to the following:

1. I will uphold the integrity of TI-UK, by ensuring that my personal and professional conduct is, and is seen to be, of the highest standard.

2. In so far as my job allows I will promote the above principles of the Transparency International Movement.
3. I will comply with all TI-UK policies and procedures as they apply to me.
4. I will show respect to all colleagues, regardless of their status or position gender, race, colour, age, religion, national origin, sexual orientation, pregnancy, marital status, medical condition, veteran status, disability, or any other legally protected category, and will allow them to have their views heard.
5. Where my job brings me into contact with vulnerable adults or children, I will never engage in any exploitative relationships, whether sexual, emotional, financial or employment related.
6. I will neither support nor take part in any form of exploitative or abusive activities, including, for example, child labour, and trafficking of human beings and commodities.
7. I will not engage in or tolerate any form of bullying or harassment in the workplace, including sexual harassment and the abuse of power.
8. I will perform my official duties and conduct my private affairs in a manner that minimises conflicts of interest with TI-UK, thereby preserving and enhancing public confidence in TI-UK.
9. My actions will be free of any consideration of personal gain over and above the remuneration attached to my post, and I will resist any undue political pressure in decision-making.
10. I will neither give nor accept any gift, remuneration, hospitality or bribe (other than minor tokens of appreciation) acting at all times in accordance with TI-UK's Anti-Bribery Policy.
11. I will not participate in activities related to procurement of goods or services or human resource management where a conflict of interest may arise.
12. I will neither solicit nor engage in commercial exchange of sexual services whilst carrying out my duties on behalf of TI-UK.
13. I will remain aware of and comply with all instructions designed to protect my health, welfare and safety. I will always consider the safety of staff in operational decisions. If I have concerns regarding my safety or that of others, I will bring this to the attention of my manager.
14. I will not attend work whilst under the influence of alcohol or drugs other than those legitimately prescribed for a medical condition.
15. I recognise that even when off-duty, when travelling on TI-UK business, my behaviour may reflect on TI-UK and will conduct myself accordingly.

I recognise that behaviour in breach of this Code of Conduct may lead to disciplinary action against me.

I commit to reporting any breaches of this Code of Conduct in accordance with TI-UK's wider Safeguarding and Whistleblowing Policies

Signed by:

Date:

Name:

## TI-UK Code of Conduct: Consultants

### Purpose

TI-UK have Codes of Conduct (*introduced in February 2019*) in place for all employees, Board members, volunteers, interns and consultants. It constitutes a personal undertaking to standards of behaviour which if breached can result in membership being withdrawn. Nothing in this document should be taken as restricting anyone's right to engage in legitimate political activity. However, it is incumbent on all signatories to declare any conflicts of interest that may arise.

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2. We undertake to be open, honest and accountable in our relationships with everyone we work with and with each other.
3. We will be democratic, politically non-partisan and non-sectarian in our work.
4. We will condemn bribery and corruption vigorously and courageously wherever it has been reliably identified.
5. The positions we take will be based on sound, objective and professional analysis and high standards of research.
6. We will only accept funding that does not compromise our ability to address issues freely, thoroughly and objectively.
7. We will provide accurate and timely reports of our activities to our stakeholders.
8. We will respect and encourage respect for fundamental rights and freedoms.
9. We are committed to building, working with and working through National Chapters worldwide.
10. We will strive for balanced and diverse representation on our governing bodies.
11. As one global movement, we stand in solidarity with each other and we will not act in ways that may adversely affect other Chapters or the TI movement as a whole.

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2. I will promote the above principles of the Transparency International Movement.

3. I will comply with all TI-UK policies and procedures as they apply to me.  
(<https://www.transparency.org.uk/governance-0/Policies%20and%20Procedures>)
4. I will show respect to all colleagues, regardless of their status or position gender, race, colour, age, religion, national origin, sexual orientation, pregnancy, marital status, medical condition, veteran status, disability, or any other legally protected category, and will allow them to have their views heard.
5. Where my role brings me into contact with vulnerable adults or children, I will never engage in any exploitative relationships, whether sexual, emotional, financial or employment related.
6. I will neither support nor take part in any form of exploitative or abusive activities, including, for example, child labour, and trafficking of human beings and commodities.
7. I will not engage in or tolerate any form of bullying or harassment in the TI-UK workplace, including sexual harassment and the abuse of power.
8. I will perform my TI-UK role and conduct my private affairs in a manner that minimises conflicts of interest with TI-UK, thereby preserving and enhancing public confidence in TI-UK.
9. My actions will be free of any consideration of personal gain over and above the fees attached to my services, and I will resist any undue political pressure in decision-making.
10. I will neither give nor accept any gift, remuneration, hospitality or bribe (other than minor tokens of appreciation) acting at all times in accordance with TI-UK's Anti-Bribery Policy.
11. I will not participate in activities related to procurement of goods or services or human resource management where a conflict of interest may arise.
12. I will neither solicit nor engage in commercial exchange of sexual services whilst carrying out any role.
13. I will remain aware of and comply with all instructions designed to protect my health, welfare and safety and that of others whilst undertaking my TI-UK role.
14. I will not undertake my role whilst under the influence of alcohol or drugs other than those legitimately prescribed for a medical condition.
15. I recognise that even when off-duty, when travelling on TI-UK business, my behaviour may reflect on TI-UK and will conduct myself accordingly.

I recognise that behaviour in breach of this Code of Conduct may lead to my consultancy services being terminated.

I commit to reporting any breaches of this Code of Conduct in accordance with TI-UK's wider Safeguarding and Whistleblowing Policies

Signed by:

Name:

Date:



## TI-UK Code of Conduct: Interns

### Purpose

TI-UK have Codes of Conduct (*introduced in February 2019*) in place for all employees, Board members, volunteers, interns and consultants. It constitutes a personal undertaking to standards of behaviour which if breached can result in membership being withdrawn. Nothing in this document should be taken as restricting anyone's right to engage in legitimate political activity. However, it is incumbent on all signatories to declare any conflicts of interest that may arise.

### Transparency International's Principles

Transparency International is a civil society organization committed to respecting the following principles:

1. As coalition builders, we will work cooperatively with all individuals and groups, with for profit and not for profit corporations and organizations, and with governments and international bodies committed to the fight against corruption, subject only to the policies and priorities set by our governing bodies.
2. We undertake to be open, honest and accountable in our relationships with everyone we work with and with each other.
3. We will be democratic, politically non-partisan and non-sectarian in our work.
4. We will condemn bribery and corruption vigorously and courageously wherever it has been reliably identified.
5. The positions we take will be based on sound, objective and professional analysis and high standards of research.
6. We will only accept funding that does not compromise our ability to address issues freely, thoroughly and objectively.
7. We will provide accurate and timely reports of our activities to our stakeholders.
8. We will respect and encourage respect for fundamental rights and freedoms.
9. We are committed to building, working with and working through National Chapters worldwide.
10. We will strive for balanced and diverse representation on our governing bodies.
11. As one global movement, we stand in solidarity with each other and we will not act in ways that may adversely affect other Chapters or the TI movement as a whole.

### Personal Commitment

During my time with TI-UK, I commit myself to the following:

1. I will uphold the integrity of TI-UK, by ensuring that my personal and professional conduct is, and is seen to be, of the highest standard.
2. I will promote the above principles of the Transparency International Movement.

3. I will comply with all TI-UK policies and procedures as they apply to me.  
(<https://www.transparency.org.uk/governance-0/Policies%20and%20Procedures>)
4. I will show respect to all colleagues, regardless of their status or position gender, race, colour, age, religion, national origin, sexual orientation, pregnancy, marital status, medical condition, veteran status, disability, or any other legally protected category, and will allow them to have their views heard.
5. Where my role brings me into contact with vulnerable adults or children, I will never engage in any exploitative relationships, whether sexual, emotional, financial or employment related.
6. I will neither support nor take part in any form of exploitative or abusive activities, including, for example, child labour, and trafficking of human beings and commodities.
7. I will not engage in or tolerate any form of bullying or harassment in the TI-UK workplace, including sexual harassment and the abuse of power.
8. I will perform my TI-UK role and conduct my private affairs in a manner that minimises conflicts of interest with TI-UK, thereby preserving and enhancing public confidence in TI-UK.
9. My actions will be free of any consideration of personal gain over and above the remuneration attached to my role, and I will resist any undue political pressure in decision-making.
10. I will neither give nor accept any gift, remuneration, hospitality or bribe (other than minor tokens of appreciation) acting at all times in accordance with TI-UK's Anti-Bribery Policy.
11. I will not participate in activities related to procurement of goods or services or human resource management where a conflict of interest may arise.
12. I will neither solicit nor engage in commercial exchange of sexual services whilst carrying out any role.
13. I will remain aware of and comply with all instructions designed to protect my health, welfare and safety and that of others whilst undertaking my TI-UK role.
14. I will not undertake my role whilst under the influence of alcohol or drugs other than those legitimately prescribed for a medical condition.
15. I recognise that even when off-duty, when travelling on TI-UK business, my behaviour may reflect on TI-UK and will conduct myself accordingly.

I recognise that behaviour in breach of this Code of Conduct may lead to my internship being terminated.

I commit to reporting any breaches of this Code of Conduct in accordance with TI-UK's wider Safeguarding and Whistleblowing Policies

Signed by:

Name:

Date:

## TI-UK Code of Conduct: Secondments

### Purpose

TI-UK have Codes of Conduct (*introduced in February 2019*) in place for all employees, Board members, volunteers, interns and consultants. It constitutes a personal undertaking to standards of behaviour which if breached can result in membership being withdrawn. Nothing in this document should be taken as restricting anyone's right to engage in legitimate political activity. However, it is incumbent on all signatories to declare any conflicts of interest that may arise.

### Transparency International's Principles

Transparency International is a civil society organization committed to respecting the following principles:

1. As coalition builders, we will work cooperatively with all individuals and groups, with for profit and not for profit corporations and organizations, and with governments and international bodies committed to the fight against corruption, subject only to the policies and priorities set by our governing bodies.
2. We undertake to be open, honest and accountable in our relationships with everyone we work with and with each other.
3. We will be democratic, politically non-partisan and non-sectarian in our work.
4. We will condemn bribery and corruption vigorously and courageously wherever it has been reliably identified.
5. The positions we take will be based on sound, objective and professional analysis and high standards of research.
6. We will only accept funding that does not compromise our ability to address issues freely, thoroughly and objectively.
7. We will provide accurate and timely reports of our activities to our stakeholders.
8. We will respect and encourage respect for fundamental rights and freedoms.
9. We are committed to building, working with and working through National Chapters worldwide.
10. We will strive for balanced and diverse representation on our governing bodies.
11. As one global movement, we stand in solidarity with each other and we will not act in ways that may adversely affect other Chapters or the TI movement as a whole.

### Personal Commitment

During my time with TI-UK, I commit myself to the following:

1. I will uphold the integrity of TI-UK, by ensuring that my personal and professional conduct is, and is seen to be, of the highest standard.
2. I will promote the above principles of the Transparency International Movement.

3. I will comply with all TI-UK policies and procedures as they apply to me.  
(<https://www.transparency.org.uk/governance-0/Policies%20and%20Procedures>)
4. I will show respect to all colleagues, regardless of their status or position gender, race, colour, age, religion, national origin, sexual orientation, pregnancy, marital status, medical condition, veteran status, disability, or any other legally protected category, and will allow them to have their views heard.
5. Where my role brings me into contact with vulnerable adults or children, I will never engage in any exploitative relationships, whether sexual, emotional, financial or employment related.
6. I will neither support nor take part in any form of exploitative or abusive activities, including, for example, child labour, and trafficking of human beings and commodities.
7. I will not engage in or tolerate any form of bullying or harassment in the TI-UK workplace, including sexual harassment and the abuse of power.
8. I will perform my TI-UK role and conduct my private affairs in a manner that minimises conflicts of interest with TI-UK, thereby preserving and enhancing public confidence in TI-UK.
9. My actions will be free of any consideration of personal gain, and I will resist any undue political pressure in decision-making.
10. I will neither give nor accept any gift, remuneration, hospitality or bribe (other than minor tokens of appreciation) acting at all times in accordance with TI-UK's Anti-Bribery Policy.
11. I will not participate in activities related to procurement of goods or services or human resource management where a conflict of interest may arise.
12. I will neither solicit nor engage in commercial exchange of sexual services whilst carrying out any role.
13. I will remain aware of and comply with all instructions designed to protect my health, welfare and safety and that of others whilst undertaking my TI-UK role.
14. I will not undertake my role whilst under the influence of alcohol or drugs other than those legitimately prescribed for a medical condition.
15. I recognise that even when off-duty, when travelling on TI-UK business, my behaviour may reflect on TI-UK and will conduct myself accordingly.

I recognise that behaviour in breach of this Code of Conduct may lead to my secondment being terminated.

I commit to reporting any breaches of this Code of Conduct in accordance with TI-UK's wider Safeguarding and Whistleblowing Policies

Signed by:

Name:

Date:

## TI-UK Code of Conduct: Advisory Council Members

### Purpose

TI-UK have Codes of Conduct (*introduced in February 2019*) in place for all employees, Board members, volunteers, interns and consultants. It constitutes a personal undertaking to standards of behaviour which if breached can result in membership being withdrawn. Nothing in this document should be taken as restricting anyone's right to engage in legitimate political activity. However, it is incumbent on all signatories to declare any conflicts of interest that may arise.

### Transparency International's Principles

Transparency International is a civil society organization committed to respecting the following principles:

1. As coalition builders, we will work cooperatively with all individuals and groups, with for profit and not for profit corporations and organizations, and with governments and international bodies committed to the fight against corruption, subject only to the policies and priorities set by our governing bodies.
2. We undertake to be open, honest and accountable in our relationships with everyone we work with and with each other.
3. We will be democratic, politically non-partisan and non-sectarian in our work.
4. We will condemn bribery and corruption vigorously and courageously wherever it has been reliably identified.
5. The positions we take will be based on sound, objective and professional analysis and high standards of research.
6. We will only accept funding that does not compromise our ability to address issues freely, thoroughly and objectively.
7. We will provide accurate and timely reports of our activities to our stakeholders.
8. We will respect and encourage respect for fundamental rights and freedoms.
9. We are committed to building, working with and working through National Chapters worldwide.
10. We will strive for balanced and diverse representation on our governing bodies.
11. As one global movement, we stand in solidarity with each other and we will not act in ways that may adversely affect other Chapters or the TI movement as a whole.

### Personal Commitment

During my time with TI-UK, I commit myself to the following:

1. I will uphold the integrity of TI-UK, by ensuring that my personal and professional conduct is, and is seen to be, of the highest standard.
2. I will promote the above principles of the Transparency International Movement.

3. I will comply with all TI-UK policies and procedures as they apply to me. (<https://www.transparency.org.uk/governance-0/Policies%20and%20Procedures>)
4. I will show respect to all colleagues, regardless of their status or position gender, race, colour, age, religion, national origin, sexual orientation, pregnancy, marital status, medical condition, veteran status, disability, or any other legally protected category, and will allow them to have their views heard.
5. Where my role brings me into contact with vulnerable adults or children, I will never engage in any exploitative relationships, whether sexual, emotional, financial or employment related.
6. I will neither support nor take part in any form of exploitative or abusive activities, including, for example, child labour, and trafficking of human beings and commodities.
7. I will not engage in or tolerate any form of bullying or harassment in the TI-UK workplace, including sexual harassment and the abuse of power.
8. I will perform my TI-UK role and conduct my private affairs in a manner that minimises conflicts of interest with TI-UK, thereby preserving and enhancing public confidence in TI-UK.
9. My actions will be free of any consideration of personal gain.
10. I will neither give nor accept any gift, remuneration, hospitality or bribe (other than minor tokens of appreciation) acting at all times in accordance with TI-UK's Anti-Bribery Policy.
11. I will not participate in activities related to procurement of goods or services or human resource management where a conflict of interest may arise.
12. I will neither solicit nor engage in commercial exchange of sexual services whilst carrying out any role.
13. I will remain aware of and comply with all instructions designed to protect my health, welfare and safety and that of others whilst undertaking my TI-UK role.
14. I will not attend TI-UK events under the influence of alcohol or drugs other than those legitimately prescribed for a medical condition.
15. I recognise that when on TI-UK business, my behaviour may reflect on TI-UK and will conduct myself accordingly.

I recognise that behaviour in breach of this Code of Conduct may lead to my Advisory Council membership being withdrawn.

I commit to reporting any breaches of this Code of Conduct in accordance with TI-UK's wider Safeguarding and Whistleblowing Policies

Signed by:

Name:

Date:

## TI-UK Code of Conduct: Board Members<sup>1</sup>

### Purpose

TI-UK have Codes of Conduct (*introduced in February 2019*) in place for all employees, Board members, volunteers, interns and consultants. It constitutes a personal undertaking to standards of behaviour which if breached can result in membership being withdrawn. Nothing in this document should be taken as restricting anyone's right to engage in legitimate political activity. However, it is incumbent on all signatories to declare any conflicts of interest that may arise.

### Transparency International's Principles

Transparency International is a civil society organization committed to respecting the following principles:

1. As coalition builders, we will work cooperatively with all individuals and groups, with for profit and not for profit corporations and organizations, and with governments and international bodies committed to the fight against corruption, subject only to the policies and priorities set by our governing bodies.
2. We undertake to be open, honest and accountable in our relationships with everyone we work with and with each other.
3. We will be democratic, politically non-partisan and non-sectarian in our work.
4. We will condemn bribery and corruption vigorously and courageously wherever it has been reliably identified.
5. The positions we take will be based on sound, objective and professional analysis and high standards of research.
6. We will only accept funding that does not compromise our ability to address issues freely, thoroughly and objectively.
7. We will provide accurate and timely reports of our activities to our stakeholders.
8. We will respect and encourage respect for fundamental rights and freedoms.
9. We are committed to building, working with and working through National Chapters worldwide.
10. We will strive for balanced and diverse representation on our governing bodies.
11. As one global movement, we stand in solidarity with each other and we will not act in ways that may adversely affect other Chapters or the TI movement as a whole.

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<sup>1</sup> Including Finance, Risk & Audit Committee Independent / non Trustee members and Advisory positions on Committees

## Personal Commitment

During my time with TI-UK, I commit myself to the following:

1. I will uphold the integrity of TI-UK, by ensuring that my personal and professional conduct is, and is seen to be, of the highest standard.
2. I will promote the above principles of the Transparency International Movement.
3. I will comply with all TI-UK policies and procedures as they apply to me. (<https://www.transparency.org.uk/governance-0/Policies%20and%20Procedures>)
4. I will show respect to all colleagues, regardless of their status or position gender, race, colour, age, religion, national origin, sexual orientation, pregnancy, marital status, medical condition, veteran status, disability, or any other legally protected category, and will allow them to have their views heard.
5. Where my role brings me into contact with vulnerable adults or children, I will never engage in any exploitative relationships, whether sexual, emotional, financial or employment related.
6. I will neither support nor take part in any form of exploitative or abusive activities, including, for example, child labour, and trafficking of human beings and commodities.
7. I will not engage in or tolerate any form of bullying or harassment in the TI-UK workplace, including sexual harassment and the abuse of power.
8. I will perform my TI-UK role and conduct my private affairs in a manner that minimises conflicts of interest with TI-UK, thereby preserving and enhancing public confidence in TI-UK.
9. My actions will be free of any consideration of personal gain.
10. I will neither give nor accept any gift, remuneration, hospitality or bribe (other than minor tokens of appreciation) acting at all times in accordance with TI-UK's Anti-Bribery Policy.
11. I will not participate in activities related to procurement of goods or services or human resource management where a conflict of interest may arise.
12. I will neither solicit nor engage in commercial exchange of sexual services whilst carrying out any role.
13. I will remain aware of and comply with all instructions designed to protect my health, welfare and safety and that of others whilst undertaking my TI-UK role.
14. I will not attend TI-UK events under the influence of alcohol or drugs other than those legitimately prescribed for a medical condition.
15. I recognise that when travelling on TI-UK business, my behaviour may reflect on TI-UK and will conduct myself accordingly.

I recognise that behaviour in breach of this Code of Conduct may lead to my Board membership being withdrawn.





I commit to reporting any breaches of this Code of Conduct in accordance with TI-UK's wider Safeguarding and Whistleblowing Policies

Signed by:

Name:

Date:

## TI-UK Code of Conduct: Members

### Purpose

TI-UK has Codes of Conduct in place for all employees, Board members, volunteers, interns and consultants. Recognising the specific role that our Members play in our governance, we ask that they all adhere to the following Code of Conduct.

### Transparency International's Principles

Transparency International is a civil society organization committed to respecting the following principles:

1. As coalition builders, we will work cooperatively with all individuals and groups, with for profit and not for profit corporations and organizations, and with governments and international bodies committed to the fight against corruption, subject only to the policies and priorities set by our governing bodies.
2. We undertake to be open, honest and accountable in our relationships with everyone we work with and with each other.
3. We will be democratic, politically non-partisan and non-sectarian in our work.
4. We will condemn bribery and corruption vigorously and courageously wherever it has been reliably identified.
5. The positions we take will be based on sound, objective and professional analysis and high standards of research.
6. We will only accept funding that does not compromise our ability to address issues freely, thoroughly and objectively.
7. We will provide accurate and timely reports of our activities to our stakeholders.
8. We will respect and encourage respect for fundamental rights and freedoms.
9. We are committed to building, working with and working through National Chapters worldwide.
10. We will strive for balanced and diverse representation on our governing bodies.
11. As one global movement, we stand in solidarity with each other and we will not act in ways that may adversely affect other Chapters or the TI movement as a whole.

### Personal Commitment

During my membership of TI-UK, I commit myself to the following:

1. I will uphold the integrity of TI-UK, by ensuring that my personal and professional conduct is, and is seen to be, of the highest standard.
2. I will promote the above principles of the Transparency International Movement.
3. I will show respect to all TI colleagues, regardless of their status or position, gender, race, colour, age, religion, national origin, sexual orientation, pregnancy, marital status, medical condition,

veteran status, disability, or any other legally protected category, and will allow them to have their views heard.

4. Should my role bring me into contact with vulnerable adults or children, I will never engage in any exploitative relationships, whether sexual, emotional, financial or employment related.
5. I will neither support nor take part in any form of exploitative or abusive activities, including, for example, child labour, and trafficking of human beings and commodities.
6. I will not engage in or tolerate any form of bullying or harassment in the TI-UK workplace or at other locations associated with TI activities, including sexual harassment and the abuse of power.

I recognise that behaviour in breach of this Code of Conduct may lead to my membership being withdrawn.

I am aware that I can also report any breaches of this Code of Conduct in accordance with TI-UK's wider Safeguarding and Whistleblowing Policies (<https://www.transparency.org.uk/governance-0/Policies%20and%20Procedures>)

Signed by:

Name:

Date:

## Complaints Policy and Procedure

Owner:	Chief Operating Officer	Status:	Approved
Last reviewed:	August 2023	Review date:	August 2025
To be read in conjunction with these other policies and procedures:			

### Complaints Definition

**A complaint is an expression of dissatisfaction.** It can relate to the standard of service you have received from us, actions taken by us or lack of action by us. A complaint can be made against a TI-UK employee, volunteer or anybody directly involved in the delivery of our work and programmes (including contractors).

**A complaint raises criticisms that expect a reply.** They allow us as an organisation to reflect and identify if we need to act differently in the future. As an opportunity to learn and develop we are grateful for the time and concern that people take to help us improve.

**A complaint is not an expression of your opposition to the Mission, Vision and Values of TI-UK.**

### Reporting Fraud or Corruption

As a charity we do not have the resources or legal expertise to take on specific cases or give advice to people who want to report corruption, bribery or fraud concerning other organisations. We regret that we are unable to investigate individual cases and make this clear on our public website along with a range of specific bodies who can be contacted. We are therefore unable to consider complaints that are directly objecting to lack of action by us on handling such matters.

### Principles

**Accountability:** Transparency International is committed to advancing accountability, integrity and transparency. We seek to ensure that our complaints policy and handling process upholds that accountability.

**Accessibility:** we are committed to making the process of submitting a complaint as easy as possible.

**Timeliness:** we are committed to **resolving complaints within three working weeks.** However, if a complaint is made three months or more after an incident it may take longer to investigate and we may require more time to respond.

**Confidentiality:** some complaints need to be kept confidential in order to safeguard those making or involved in the complaint. We may also decide to take disciplinary action following a complaint that has been upheld. In these situations we can only provide limited feedback to the complainant.

**Documented:** in most instances we require complaints to be made in writing. This ensures that we can fully understand and investigate complaints.

**Mutual respect:** everyone who makes a complaint will be treated with courtesy and respect. Complainants are also expected to communicate their concerns calmly and without harassing or abusing Transparency International UK people.

**Learning:** all complaints are logged and monitored.

### How to contact us

If you have a comment, suggestion or complaint we would like to hear from you. We have resources in place to receive your complaint by email or post using the contact details below. We recognise that

those with disabilities may require assistance and support with what may be an unfamiliar process. We are more than happy to assist you with a complaint submission.

- By email (preference): [reportingconcerns@transparency.org.uk](mailto:reportingconcerns@transparency.org.uk)
- By post: Complaints Handling, TI-UK, 10 Queen Street Place, London, EC4R 1AG

To help us respond to you in a timely manner, please include:

- Your full name and address
- Email address we can contact you on
- Contact telephone number
- Outline the type of complaint you are making (*Allegation of Fraud/ Safeguarding Concerns/ our Programme in the UK, our Programme Funded in Overseas Countries, Other*)
- Details of the specific complaint in sufficient detail to allow the matter to be investigated and followed up
- Your suggestions / expectations as to how we can respond to the complaint.

TI-UK cannot respond to complaints made anonymously (*as a minimum we require the full name and a contact email, address or telephone number of the complainant*).

Transparency International UK is registered separately from Transparency International (TI) Chapters in other countries and the TI Secretariat. We are therefore unable to handle complaints related to any of the other Chapters. If matters related to them are referred to us, we shall pass these on to the relevant Executive Director. They will decide how to respond.

### How long will it take to hear from us?

You will receive an **acknowledgement** of your complaint within **two working days** of receipt. We shall also provide you with the name and job title of the individual who has been assigned to look into your complaint.

We aim to **respond fully and conclusively** to all complaints within a further **ten working days**. Wherever possible, we will try and deal with your complaint more quickly. At times it may take longer to organise and undertake the investigation. In these circumstances we shall explain this but we are unable to provide updates as to how that investigation is proceeding.

Please feel free to include details of how you think the complaint could be resolved when you contact us as this often helps us conclude the matter faster.

### Our Procedure

If your complaint relates to our programme, activities or employees in TI-UK we will review the complaint with the relevant Programme Director.

If your complaint relates to allegations of fraud we will follow our Anti-Fraud Policy and Fraud Response Guide and this could involve external parties following up to investigate.

If your complaint relates to our programme, activities or employees in one of the TI Chapters or partner countries overseas we will provide details to the relevant Executive Director who will review the complaint and provide a response.

If your complaint relates to safeguarding issues affecting children, young people or vulnerable adults the nominated Safeguarding Officer will review the complaint and provide a response.

There are rare occasions when we choose not to respond to a complaint. These can include:

- Where a complainant's manner is abusive, prejudiced or offensive
- Where a complaint is perceived to be harassing one of our people

- Where a complaint is incoherent or illegible
- Where a complaint relates to comments on TI-UK social media over which we had no control (*abusive, prejudiced or offensive comments will be removed if highlighted to us*)
- Where a matter is raised that has already been investigated and responded to
- Where a complaint has been clearly sent to us by those opposed to the Vision, Mission and Values of TI-UK and is aimed at diverting our time and resources from our primary charitable work.

### If you are not happy with our complaint handling

We really hope that we are able to resolve your complaint in an open, honest and satisfactory way. If you are unhappy with our response, a right of appeal exists where the matter will be immediately referred to the Chief Executive. The Chief Executive or their nominated Senior Leadership Team member will review the complaint, review the process and outcome of the investigation and consider whether there are grounds to re-open and reconsider the complaint. A summary document will be produced and communicated to the complainant. We aim to complete the appeal within ten working days.

If you are still unhappy then you can write to the following organisations:

- The Transparency International Secretariat (<https://www.transparency.org/whoweare/contact>)
- The Charity Commission (<https://www.charity-commission.gov.uk>)
- Fundraising Standards Board where your complaint is related to fundraising (<http://www.frsb.org.uk/>)

The respective web-sites will have up-to-date details on how to file a complaint.

## Date: Cookies Policy

Owner:	<b>COO</b>	Status:	Approved
Last reviewed:	April 2021	Review date:	April 2023
To be read in conjunction with these other policies and procedures:		<ul style="list-style-type: none"><li>Privacy Policy</li></ul>	

## What are Cookies?

Cookies are 'text files' which can be read using the Notebook program on a device accessing web-sites. They contain two pieces of information: the site name and a unique user ID. When a visitor accesses one of TI-UK's web-sites for the first time a cookie is downloaded. The next time and each time subsequently visited, the device checks to see if it has a relevant cookie (one containing the site name) and sends the information contained in that cookie back to the site. This allows the site to 'know the user'.

## Why does TI-UK use Cookies?

TI-UK use cookies to help provide users you a good browsing experience providing useful data that helps improve the content that is most relevant and utilized most frequently.

## What Cookies does TI-UK have in place?

Cookies fall into two categories:

- Strictly necessary cookies – these are required for the operation of our website.
- Analytical or performance cookies – these allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

The cookies that our website currently stores are:

Cookie	Description	Duration
<b>Necessary</b>		
has_js	This cookie is used to indicate whether the user's browser has enabled JavaScript.	-
<b>Analytical / Performance</b>		
_ga	This cookie is installed by Google Analytics. The cookie is used to calculate visitor, session, campaign data and keep track of site usage for the site's	2 years

	analytics report. The cookies store information anonymously and assign a randomly generated number to identify unique visitors.	
_gid	This cookie is installed by Google Analytics. The cookie is used to store information of how visitors use a website and helps in creating an analytics report of how the website is performing. The data collected including the number visitors, the source where they have come from, and the pages visited in an anonymous form.	1 day
_gat	This cookie is installed by Google Universal Analytics to throttle the request rate to limit the collection of data on high traffic sites.	1 minute

## Blocking Cookies

Cookies can be deactivated by reviewing the setting on your device. Please do note that blocking all cookies (including essential cookies) may lead to problems accessing all parts of TI-UK's websites.

## Social Media Links

TI-UK websites contain links to Facebook, Twitter and other similar social media sites. These allow users to share the content of TI-UK websites with others via social media. The sharing buttons contain third-party cookies.

If a user does not wish to link the information gathered through TI-UK's sites to their your social media user account then they should ensure they are logged out of those accounts whilst browsing. The specific privacy policies of those social media accounts will outline how data is being processed and their use of cookies.



## Data Protection and Privacy Policy

Owner:	<b>People Team</b>	Status:	Approved
Last reviewed:	August 2023	Review date:	August 2025
To be read in conjunction with these other policies and procedures:		<ul style="list-style-type: none"><li>• Privacy Policy (Annex)</li><li>• Data Monitoring Policy (Annex)</li></ul>	

### Purpose of the document

The document spells out how TI-UK will protect employee privacy in accordance with the General Data Protection Regulation (GDPR). A separate Privacy Policy exists for our interaction with external parties and this can be found on the TI-UK website (copy in ANNEX).

### The Policy

TI-UK collects and processes personal data relating to its employees to manage the employment relationship. TI-UK is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

### What information do we collect?

TI-UK collects and processes a range of information about you as an employee. This includes:

- your name, address and contact details, including email address and telephone number, date of birth and gender;
- the terms and conditions of your employment;
- details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with the organisation;
- information about your remuneration, including entitlement to benefits such as pensions or insurance cover;
- details of your bank account and national insurance number;
- information about your marital status, next of kin, dependants and emergency contacts;
- information about your nationality and entitlement to work in the UK;
- details of your schedule (days of work and working hours) and attendance at work;
- details of periods of leave taken by you, including holiday, sickness absence, family leave and sabbaticals, and the reasons for the leave;
- details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence;
- assessments of your performance, including appraisals, performance reviews, training you have participated in, performance improvement plans and related correspondence;
- information about medical or health conditions, including whether or not you have a disability for which the organisation needs to make reasonable adjustments.

TI-UK collects this information in a variety of ways. For example, data is collected through application forms/platform (including Be Applied), CVs or resumes; obtained from your passport or other identity documents such as your driving licence; from forms completed by you at the start of or during employment (such as benefit nomination forms, payroll forms); from correspondence with you; or through interviews, meetings or other assessments.

In some cases, TI-UK collects personal data about you from third parties, such as references supplied by former employers and where necessary information from employment background check providers.

We seek information from third parties with your consent only. Colleagues need to recognise that some information may be publicly available, e.g. on social media.

Data is stored in a range of different places, including in your personnel file, in the organisation's HR management systems and in other IT systems (including the organisation's email system).

#### Why does TI-UK process personal data?

TI-UK needs to process data to enter into an employment contract with you and to meet our obligations under your employment contract. For example, we need to pay you in accordance with your employment contract and to administer your pension and any other benefits, where applicable.

In some cases, TI-UK needs to process data to ensure that it is complying with its legal obligations. For example, we are required to check an employee's entitlement to work in the UK, to deduct tax, to comply with health and safety laws and to enable employees to take periods of leave to which they are entitled.

In other cases, TI-UK has a legitimate interest in processing personal data before, during and after the end of the employment relationship. Processing employee data allows TI-UK to:

- run recruitment and promotion processes;
- maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency), and records of employee contractual and statutory rights;
- operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace;
- operate and keep a record of employee performance and related processes, to plan for career development, and for succession planning and workforce management purposes;
- operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled;
- obtain occupational health advice, to ensure that it complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law, and ensure that employees are receiving the pay or other benefits to which they are entitled;
- operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective workforce management, to ensure that the organisation complies with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled;
- ensure effective general HR and business administration;
- provide references on request for current or former employees;
- respond to and defend against legal claims; and
- maintain and promote equality in the workplace.

Some special categories of personal data, such as information about health or medical conditions, is processed to carry out employment law obligations (such as those in relation to employees with

disabilities and for health and safety purposes). Please see the Diversity Monitoring policy and form (**Annex**) for further details.

#### Who has access to data?

Your information will be shared internally, including with members of the People team and recruitment team (including payroll), your line manager, managers in the business area in which you work and IT if access to the data is necessary for performance of their roles.

TI-UK shares your data with third parties in order to obtain pre-employment references from other employers.

TI-UK also shares your data with third parties that process data on our behalf, in connection with payroll, the provision of benefits and potentially the provision of occupational health services.

TI-UK will not normally transfer your data to countries outside the European Economic Area. If such a transfer becomes necessary, permission will be sought and TI-UK will ensure that all necessary controls are in place.

#### How does TI-UK protect data?

TI-UK takes the security of your data seriously. TI-UK has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the performance of their duties.

Where TI-UK engages third parties to process personal data on its behalf, we do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

#### For how long does TI-UK keep data?

TI-UK will hold your personal data for the duration of your employment and for up to six years after your departure in accordance with UK legislation.

#### Your rights

TI-UK wishes to be open about the data it holds. As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require TI-UK to change incorrect or incomplete data;
- require TI-UK to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where TI-UK is relying on its legitimate interests as the legal ground for processing; and
- ask TI-UK to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the organisation's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact the People team.

If you believe that TI-UK has not complied with your data protection rights, you can raise this matter with the Financial Controller (Data Protection Officer). Where you are not satisfied with TI-UK's response you can complain to the Information Commissioner.

#### What if you do not provide personal data?

You have some obligations under your employment contract to provide TI-UK with data. In particular, you are required to report absences from work and may be required to provide information about disciplinary or other matters under the implied duty of good faith. You may also have to provide the organisation with data in order to exercise your statutory rights, such as in relation to statutory leave entitlements. Failing to provide the data may mean that you are unable to exercise your statutory rights.

Certain information, such as contact details, your right to work in the UK and payment details, have to be provided to enable the organisation to enter a contract of employment with you. If you do not provide other information, this will hinder the organisation's ability to administer the rights and obligations arising as a result of the employment relationship efficiently.

#### Automated decision-making

Employment related decisions are not based solely on automated decision-making.

#### Post-employment

TI-UK will hold your personal data for up to six years after your departure in accordance with UK legislation.

TI-UK may keep contact details on mailing lists etc. Former employees have the usual rights spelt out in the GDPR to have their information removed from such lists.

As per TI-UK's Departure Procedures, former employees will be offered the chance to opt in to the Alumni Register. That opt-in may be reversed at any time.

# Annex: PRIVACY POLICY (Revision Approved 23 October 2020)

## Introduction and general terms

Transparency International UK, (from herein referred to as TI-UK), and the people we seek to benefit, are dependent on the generosity of our supporters as well as the goodwill and trust of the public. We are therefore committed to protecting any personal information we obtain about you, whether you are just visiting our website or are a financial supporter, volunteer or campaigner. This Privacy Policy sets out how we obtain, use and protect any personal information you provide to us: whether online, via phone, text, Email, in letters or in other correspondence.

This privacy policy explains the following:

- What information TI-UK may collect about you
- How TI-UK will use information we collect about you and our lawful basis for this
- When TI-UK may use your details to contact you
- Whether TI-UK will disclose your details to anyone else
- Your choices regarding the personal information you provide to us.

TI-UK is committed to safeguarding your personal information. Whenever you provide such information, we are legally obliged to use your Information in line with all laws concerning the protection of personal information.

The TI-UK website contains hyperlinks to websites owned and operated by third parties. These third party websites have their own privacy policies, including policies on their use of cookies, and we urge you to review them. They will govern the use of personal information you submit or which is collected by cookies whilst visiting these websites. We cannot accept any responsibility or liability for the privacy practices of such third party websites and your use of such websites at your own risk.

## Who we are

TI-UK is a registered charity (charity number 1112842) and a company limited by guarantee (company number 2903386). TI-UK's registered address is 10 Queen Street Place London UK EC4R 1AG.

TI-UK is an affiliate member of the TI movement. This Privacy Policy relates to information which is obtained by TI-UK and not by other entities in the Transparency International movement.

## Why do we hold and process your data and what is our lawful basis?

We hold and process your data for a number of reasons as set out below. For each purpose data protection laws require us to have a lawful basis and we have identified that too:

- To keep a record of donations made by our supporters in order to communicate our thanks or to help with future campaigning. Our lawful basis is legitimate interests in engaging with our supporters and raising donations.
- To claim gift aid on donations. Our lawful basis is compliance with applicable laws and our legitimate interests of ensuring that we maximise donations.
- To send our supporters marketing information about our projects and fundraising activities. Our lawful basis is consent and we won't send you marketing information unless you request it.
- To fulfil contractual obligations entered into with supporters. Our lawful basis is compliance with those contracts.
- To record campaigning actions by supporters. Our lawful basis is legitimate interests in keeping a record and understanding our campaigning activities so we can make improvements and account for our activities.
- To ensure we do not send unwanted information to supporters or members of the public who have informed us they do not wish to be contacted. Our lawful basis is legitimate interests and compliance with laws.
- In relation to any correspondence you have entered into with us whether by letter, email, text, social media, message board or any other means. Our lawful basis is our legitimate interests in responding to your correspondence.
- For "service administration purposes", which means that TI-UK may contact you for reasons related to donations you have made such as your tax status with regard to Gift Aid, the completion of commercial or other transactions you have entered into with TI-UK or the activity or online content you have signed up for. Our lawful basis is fulfilment of contracts and compliance with applicable laws.
- For internal record keeping. Our lawful basis is in keeping a record of our activities and in the event of any complaints or issues that arise.
- To invite you to participate in surveys or research about TI-UK or our work (participation is always voluntary). Our lawful basis is legitimate interests in conducting research and surveys to better understand our engagement and how we could improve our activities.
- To use IP addresses to identify the location of users, to block disruptive use, to establish the number of visits from different countries. Our lawful basis is our legitimate interests of managing the charity and protecting it.

#### What information will TI-UK collect about me?

When you contact TI-UK, either online or by any other means, such as newsletters, competitions, or message boards, or you telephone, email, write to or text TI-UK, or engage with TI-UK via social media channels, we may receive and retain personal information about you. This can consist of Information such

as your name, email address, postal address, telephone or mobile number, bank account details to process donations and whether or not you are a tax payer so that we can claim Gift Aid.

By submitting your details, you enable TI-UK to raise funds and to provide you with the goods, services, information, activities or online content you select.

We do not usually collect 'sensitive personal data' about our supporters. e.g. health status, unless there is a clear reason for doing so - such as to ensure that we provide appropriate facilities or support to enable you to participate in an event in accordance with applicable law and we rely on your consent for doing so. Clear notices will be provided on applications for such events so that it is clear what information we need and why we need it.

If you are simply browsing our website as an anonymous visitor, TI-UK may still collect certain information from you, such as your IP addresses (an IP address is a number that can uniquely identify a specific computer or other network device on the Internet).

TI-UK may also use publicly available information to undertake due diligence prior to accepting donations (in line with TI-UK's Donations Policy), including by using a third party intermediary if necessary, and to identify people who express an interest in giving major gifts to organisations like TI-UK, or who may be interested in a high profile public association with TI-UK. This information may include newspaper or other media coverage, open postings on social media sites such as LinkedIn, and data from Companies' House. Where an individual enters into such a relationship with TI-UK they will have a nominated account manager who will agree with the individual any sensitivities they may have with regard to any personal information that TI-UK may hold on them. Our lawful basis is our legitimate interests and legal obligations in ensuring that donations made are compliant and appropriate.

If you enter your contact details in one of our online forms, we may use this information to contact you even if you don't "send" or "submit" the form. We will only do this to see if we can help with any problems you might be experiencing with the form or with our websites.

TI-UK also uses cookies. Cookies are small text files on your device. They are made by your web browser when you visit a website. Every time you go back to that website, your browser will send the cookie file back to the website's server. They improve your experience of using a website, for example by remembering your preference settings and by measuring your use of a website to ensure that it meets your needs.

### [How and when will TI-UK use the information you collect about me?](#)

TI-UK may collect your personal data in the following circumstances:

#### [When you give it to us directly](#)

You may give us your personal data directly when you make a donation, sign up for one of our events or communicate with us.

#### [When you give it to us indirectly](#)

You may give us your information indirectly when you sign up to events or contribute to TI-UK via fundraising sites like Just Giving. These independent third parties will pass your data to TI-UK where you

have indicated that you wish to support TI-UK and have given your consent or it is a necessary part of completing a contract with you.

#### **When you access TI-UK Social Media**

We might also obtain your personal data if you choose to contact us through social media channels.

#### **When the information is publicly available**

We might also obtain personal data about individuals who may be interested in giving major gifts to charities or organisations like TI-UK. In this scenario, TI-UK may seek to find out more about these individuals, their interests and motivations for giving through publicly available information. This information may include newspaper or other media coverage, open postings on social media and data from Companies House. TI-UK will not retain publicly available data relating to major donations without their consent, which will be sought at the earliest practical opportunity.

#### **When we use cookies**

Please refer to our policy on cookies for further details.

#### **Will I be contacted for marketing purposes?**

TI-UK will only contact you for marketing purposes where you have provided us with freely given consent to do so. You may provide that consent in various ways including through online or paper forms (where consent statements are clearly visible) or through face to face or telephone engagement with our employees or representatives.

Please see below for information on how to change your communication preferences including opting out of future marketing communications.

#### **Will TI-UK share my personal information with anyone else or overseas?**

We will only use your information within TI-UK for the purposes for which it was obtained. TI-UK will not, under any circumstances, share or sell your personal data with any third party for marketing purposes and you will not receive others from other companies or organisations as a result of giving your details to us.

We may need to share your information with “data processors” such as our service providers, associated organisations and agents who help us to prepare and send the materials relating to our projects and fundraising activities. These “data processors” will only act under our instruction and we will not allow these organisations to use your data for their own purposes and will take care to ensure that they keep your data secure. Sometimes such data processors may be located outside of the UK or European Union in which case we ensure that adequate safeguards are in place in accordance with data protection laws to share your personal data with them. Generally the safeguards are European Commission approved contractual clauses.

Some personal data may also be shared by us with employees working with us who are not based in the UK or European Union in which case this is done in order to ensure that they can fulfil their specific roles.



We will also comply with legal requests where disclosure is required or permitted by law (for example to government bodies for tax purposes or law enforcement agencies for the prevention and detection of crime, subject to such bodies providing us with a relevant request in writing).

#### Offensive or inappropriate content placed on the TI-UK website

If you post or send offensive, inappropriate or objectionable content to or anywhere on the TI-UK website or otherwise engage in any disruptive behaviour on any TI-UK service, we may use your personal information to stop such behaviour.

Where TI-UK reasonably believes that you are or may be in breach of any of the laws of the United Kingdom (e.g. because content you have posted may be defamatory), we may use your personal information to inform relevant third parties such as your employer, internet provider or law enforcement agencies about the content and your behaviour.

#### How long will TI-UK keep my personal information?

Where you give us your consent to send marketing information, we will wherever possible let you know how long this consent will last. Unless we have grounds for believing that a longer period is reasonable and have explained this to you, we will understand your consent to last for seven years since you last make contact with us. After this time, in order for us to continue to update you, we will need your refreshed consent. You can update or withdraw your consent at any time, for individual channels of communication, or for all channels.

If you request that we stop sending you marketing materials we will keep a record of your contact details and appropriate information to enable us to comply with your request not to be contacted by us.

Management of legacy information is of a long term nature. We may keep data relating to a legacy that you provide to us indefinitely, to carry out legacy administration and communicate effectively with the families of people leaving us legacies. This also enables us to identify and analyse the source of legacy income we receive.

Where you contribute material to us, e.g. user generated content or in response to a particular campaign we will generally only keep your content for as long as is reasonably required for the purpose for which it was submitted unless otherwise stated at the point of generation.

In certain instances, for statutory purposes, it will be necessary for TI-UK to hold information for a longer period due for statutory purposes. For example, we need to hold donation records for up to seven years, in these cases we will endeavour to only hold information for as long as required for the particularly statutory purpose.

#### What are my rights?

You have various rights in relation to your personal data. This includes a right to access, restrict, port or delete personal data subject to certain exceptions. You can use the contact details below if you wish to exercise or find out more about these rights.

You also have a right to accuracy. The accuracy of your information is really important to us. We want to ensure that we are able to communicate with you in ways that you are happy with, and to provide you

with information that is of interest. If you wish to change how we communicate with you, or update the information we hold, then please contact us;

- email us at [Info@transparency.org.uk](mailto:Info@transparency.org.uk)
- write to us at:  
Data Protection Officer,  
Transparency International UK  
10 Queen Street Place, London EC4R 1AG

You also have a right to opt out of marketing emails at any time by clicking the unsubscribe link in any marketing email from TI-UK. Under the Data Protection Act you have the right to request a copy of the personal information we hold about you and to have any inaccuracies corrected. We will endeavour to provide you with this information within two weeks of receiving your request.

### [Cookies Policy - information TI-UK collects from your computer or mobile device](#)

#### [What is a cookie?](#)

Cookies are small text files on your device. They are made by your web-browser when you visit a website. Every time you go back to that website, your browser will send the cookie file back to the website's server. Cookies are useful because they allow a website to recognise a user's device.

Cookies do lots of different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improving the user experience.

They can also help to ensure that adverts you see online are more relevant to you and your interests.

#### [Why does TI-UK use cookies?](#)

Like many websites, TI-UK uses cookies in order to provide you with a more personalised web service. Cookies help us identify which bits of our website people are using and help us do work on those sections of the website to improve the user experience. We also use cookies to help show content on our site which is relevant to you and your interests, for example if on a previous visit you went to our pages about research, business integrity or events, we might find this out from your cookie and show you other information on our website related to research, business integrity or events on subsequent visits.

Information supplied in cookies also allows us to measure the effectiveness of online marketing campaigns for TI-UK. This enables us to ensure any money we spend on digital marketing gives us a good return on investment.

#### [Changes to TI-UK's Privacy Policy](#)

This Privacy Policy may be updated from time to time so you may wish to check it each time you submit personal information to TI-UK. The date of the most recent revisions will appear on this page. If you do not agree to these changes, please do not continue to use the TI-UK website to submit personal information to TI-UK. If material changes are made to the Privacy Policy we will notify you by placing a prominent notice on the website.

## Annex: Diversity Monitoring Policy and Form

Owner:	<b>People Team</b>	Status:	Approved
Last updated:	August 2023	Review date:	August 2023
To be read in conjunction with these other policies and procedures:		Equal Opportunities & Promoting Diversity Policy	

This policy details how Transparency International UK collects, stores and analyses data on diversity of our employees, applicants, board members, trustees, volunteers, members and Friends of TI-UK.

TI-UK is committed to recruiting, retaining and developing colleagues that at all grades reflects the diverse communities we live and work in. Our core values include respect, trust and fairness and our desire is to create a working environment where diversity is celebrated and respected, everyone is valued whatever their background. To help us do this we need to assess our organisational diversity profile and be able to monitor impact and outcome for different groups at all stages of the employee life cycle.

It is vital that we collect, monitor and analyse diversity information so that we can ensure that our people processes are fair, transparent and promote equality of opportunity for all colleagues throughout the employee life cycle. Our goals in collecting this data will be to:

- Build our reputation as an organisation that promotes diversity and inclusion in their employees
- Ensure we design and use policies and processes that attract and retain a diverse and talented workforce
- Conduct accurate equality impact analyses when we undertake organisational change processes such as restructures or redundancies
- Value and support the diversity of people's backgrounds to promote a sense of wellbeing at work and get the best out of our people
- Design a workspace that is comfortable for everyone and eliminates physical, mental and emotional barriers
- Proactively avoid potential reputational risk caused by negative publicity or costly employment tribunal claims.

In order to achieve these objectives, we will use diversity statistics to:

- Monitor our diversity and inclusion initiatives
- Comparison with peer organisations
- Monitor recruitment and support making our brand more attractive to a diverse job market
- Support equality impact analyses and be able to report on how our policies, procedures, organisational change processes impact on different groups
- Address inequalities in pay, promotion and progression
- Identify and provide appropriate support for under-represented groups

- As signatories to the Race at Work Charter we have undertaken to “Capture and Publish Equality Pay Gap Data”

### How do we store and protect this data?

All information TI-UK collects around equality and diversity will be treated confidentially in accordance with the Data Protection Act and will be stored on the organisation’s databases. Access to this information will be restricted to staff involved in the processing and monitoring of this data. It will be used to provide statistical information only. We may choose to publish diversity statistics but only where it will not identify specific individuals. Diversity data for employees, board members, and trustees will be kept for 6 years after their employment ends. Applicant data on the Be Applied recruitment platform is used for statistics and monitoring and is not linked to individuals.

## Diversity Monitoring Policy and Form

We would appreciate your co-operation in completing this form to help us better understand how we can ensure equality of opportunity for all. Please complete this form and return it to the People Team where it will be used to complete statistical information.

### Gender

How would you describe your gender?

☐ Female ☐ Male ☐ I prefer to describe myself as \_\_\_\_\_

☐ I prefer not to say

Is your gender identity the same as the gender you were originally assigned at birth?

☐ Yes ☐ No

☐ I prefer not to say

### Marriage/ Partnership

**Are you married or in a civil partnership?** Yes ☐ No ☐ Prefer not to say ☐

### Age

What was your age group at your last birthday?

☐ 16-24 ☐ 25-34 ☐ 35-44 ☐ 45-54 ☐ 55-64 ☐ 65-74

☐ 75-84 ☐ 85 or over ☐ I prefer not to say

### Ethnicity

What is your ethnic group? Choose one option that most accurately describes your ethnic group or background or if you cannot identify one listed please describe your ethnicity in the way that you wish us to record it.

### Asian / Asian British

☐ Indian ☐ Pakistani ☐ Bangladeshi ☐ Chinese ☐ Prefer not to say

☐ Any other Asian background, please describe \_\_\_\_\_

**Black / African / Caribbean / Black British**

☐ African ☐ Caribbean ☐ Prefer not to say

☐ Any other Black / African / Caribbean background, please describe \_\_\_\_\_

**Mixed / Multiple ethnic groups**

☐ White and Black Caribbean ☐ White and Black African ☐ White and Asian ☐ Black and Asian

☐ Any other Mixed / Multiple ethnic background, please describe \_\_\_\_\_

**White**

☐ English ☐ Welsh ☐ Scottish ☐ Northern Irish ☐ British ☐ Irish ☐ Gypsy or Irish Traveller

☐ Any other White background, please describe \_\_\_\_\_

**Other ethnic group**

Arab ☐

Any other ethnic group, please describe \_\_\_\_\_

**Prefer not to say** ☐

**Disability**

**Do you consider yourself to have a disability or health condition?**

☐ No ☐ Yes

☐ I prefer not to say

**Sexual Orientation**

What is your sexual orientation?

☐ Heterosexual ☐ Bisexual ☐ Gay ☐ Lesbian

☐ Other \_\_\_\_\_

☐ I prefer not to say

**Religion or belief**

What is your religion or belief?

☐ Buddhist ☐ Christian ☐ Hindu ☐ Jewish ☐ Muslim ☐ Sikh ☐ Other \_\_\_\_\_

☐ No Religion ☐ Atheist ☐ I prefer not to say

Should you have any questions, please contact the People Team at: [hr@transparency.org.uk](mailto:hr@transparency.org.uk)

## Departure Procedures (Employees and Interns)

Owner:	<b>People Team</b>	Status:	Approved
Last reviewed:	August 2023	Review date:	August 2025
To be read in conjunction with these other policies and procedures:		<ul style="list-style-type: none"> <li>• Standard Terms and Conditions</li> <li>• Grievance and Disciplinary Procedures</li> <li>• Leave Policy</li> </ul>	

### Purpose of the document

This document spells out the steps to be taken when an employee or an intern departs TI-UK.

### Termination of Employment

#### Termination by the employee

All employees, including interns, are entitled to terminate their appointment at any time by submitting in writing the amount of notice set out in their contract. At the time of writing these are:

Grade	Probationary period	Notice during probation	Notice after probation
1	1 month	1 week	2 weeks
2	3 months	1 week	1 month
3	3 months	1 week	2 months
4	4 months	2 weeks	3 months
5	6 months	1 month	3 months
6	6 months	1 month	4 months (6 for CE)

#### Termination by TI-UK

There are three grounds on which TI-UK may terminate an employee's contract:

- The employee is on a fixed term contract which has finished and is not being renewed;
- TI-UK has decided that the post occupied by the employee is redundant;
- The employee has committed a disciplinary offence or breached a contractual condition.

In summary, the conditions of TI-UK's standard contract allow for dismissal without notice on the following grounds:

- Breach of that contract
- Dishonesty, misconduct, incompetence or wilful neglect of duty
- Being convicted of a criminal offence (other than a non-custodial road traffic offence)
- Becoming bankrupt or insolvent
- Guilty of conduct which brings their professional reputation or TI-UK into disrepute.

Should an employee's appointment be terminated by TI-UK, this will be done in a fair and transparent manner and in accordance with UK employment law. Notice given will be in accordance with the employee's contract, unless the termination is without notice.

TI-UK does not operate a normal retirement age and will not terminate contracts on the grounds of age.

### Departure arrangements

Where an employee resigns or a contract comes to an end, the employee should liaise with their line manager, People team, finance and office administration to ensure the following:

- An actual departure date is agreed bearing in mind any notice period and balance of leave days (note that, in accordance with the Leave Policy, TI-UK will pay in lieu for accrued leave but will not normally approve additional leave during the notice period).
- A final salary payment taking into account untaken leave, any outstanding loans and any cash advances is agreed and signed for.
- Any outstanding expenses claims are submitted and paid.
- All TI-UK assets including, but not limited to, IT and office equipment; credit cards and security cards are returned and signed off as returned.
- A proper handover process for the employee's work and responsibilities is designed and completed (see annex).
- An exit interview is carried out if the employee so wishes.

In the case of redundancy, TI-UK will comply with such legislation as may be in force at the time with respect to notice, redundancy pay and any other arrangements.

Where an employee's contract is terminated by TI-UK on disciplinary grounds or due to breach of contract and without notice, TI-UK may suspend that employee from the performance of any or all of their duties and direct that they do not attend the offices of TI-UK, in accordance with their contract of employment.

### Exit Interviews

When an employee departs TI-UK as a result of a contract being completed or through their submitting notice, they will be offered an exit interview with their department head, People Team or the Chief Executive.

For TI-UK, the exit interview is a valuable source of information for assessing and improving all aspects of the working environment, culture, processes and systems, management and development. Also transfer of knowledge and experience from the departing employee to a successor or replacement can be enabled, in case this has not taken place through a proper handover.

For the departing employee the exit interview is an opportunity to raise frankly and in confidence any issues, comments or suggestions about TI-UK and their work for the organisation.

The decision as to whether or not to participate in an Exit Interview lies with the departing employee. It is also possible to give written feedback.

TI-UK will ensure that a departing employee's feedback:

- will be handled confidentially;
- will not be used in any negative way against them;
- will be used solely for purposes of learning and the organisation's improvement.

## Alumni Register

Departing colleagues will be offered the opportunity to opt in to the alumni register in order to maintain contact with the organisation.

## Annex: Handover Notes

Handover notes for a role should include the items listed below. Overall:

- They should be kept relatively brief and cross referenced to key documents.
- Wherever relevant the role/person who is expected to pick up the work should be named.
- They should be copied to all relevant parties and filed on TI-UK's servers.
- Confidential material (if any) should form a separate annex.

## Content

The following areas need to be covered but it may make sense to structure the notes in a different way:

### 1. Description of main tasks

Main normal areas of work, referenced to relevant supporting documents and people who can advise. Including budgetary, financial and HR where appropriate.

### 2. Description of recent work

Work completed over the past 3-6 months with reference to outputs such as reports, meeting records etc. and the main people involved.

### 3. Key contacts

Ensure that details of key internal and external contacts are either included in the main text or copied separately (e.g. by exporting a contacts list from Outlook)

### 4. Action plan

Imminent deadlines (~3 months) with details of what needs to be done by whom.



## Diversity Commitment for Public Speaking Events

Owner:	<b>Chief Executive</b>	Status:	<b>Approved</b>
Last reviewed:	September 2024	Review date:	September 2026
To be read in conjunction with these other policies and procedures:		<ul style="list-style-type: none"><li>• Equal Opportunities &amp; Promoting Diversity Policy</li></ul>	

### Policy

In supporting gender equality and promoting diversity at public speaking events TI-UK recognises that women and those from other underrepresented groups are too often absent from panels and speaking slots at public events and conferences.

To address this TI-UK commit to gender equality and diversity being represented in the events they organise, e.g. lectures and joint report launches. Where they are asked to participate and speak at external conferences / symposiums they will use their role to encourage conference organisers to adequately promote diversity and inclusion and, where a solution to all Male panels cannot be found TI-UK will politely withdraw from the event.

### All Male Panels

The issue of all male panels at major conferences has been widely discussed in recent years in the media and within specific communities i.e. scientific community. Whilst the issue started with concerns at all male panels, often referred to as (Manels) the discussions have broadened to include the content of conferences. These public events, often reported on social media brings to a wider world the sense that only men hold the positions of power, influence, knowledge and expertise in the specific field. Not only can this be misrepresentative of those often producing the work and insights it can also further hamper women seeing for themselves roles within that sector. At TI-UK it is essential to ensure public representation is reflective of the diversity of our teams and the breath of expertise held by all colleagues.

### Definition of a Panel Event

It is recognised that each event/ conference etc will have a specific format, purpose and be reported in different ways. A Panel event may be either a:

**Panel of Speakers** : a set of presentations, one after another. The panel format allows for a brief introduction and then discussion among the panellists and audience. A panel would be two or more speakers and there may also been a chair of session lead that introduces each presentation etc.

**Roundtable**: the panel or roundtable discussion is a generic term that means that more than two persons (speaker and moderator) are on the stage at the same time. This may be part of a free paper session, or take place after several talks. Symposiums and colloquiums are simply other names for the roundtable format.

### TI-UK Diversity Commitment

TI-UK acknowledges the often lack of diversity of expertise and opinion promoted at public conferences or similar events. In participating as speakers at such public events TI-UK will actively avoid contributing to all Male panels by nominating alternative expert speakers who are able to provide that important and valued diversity. We will not participate where only those who identify as

males have been invited to speak or arrangements have not been made to adequately address this and other diversity concerns.

To avoid this, conference organisers are encouraged to have a diverse organising committee to allow for different experiences, networks and insights that can positively influence the agenda, speakers and attendees. We believe this approach will lead to better quality conferences with meaningful and informed outcomes. The ambition to have equal gender balance on panels is the ideal. Women should be provided not only with Chairing or Moderating roles but also as Speakers on panels. Where topics include gender the assumption that only a female can present on this is challenged.

Where all male panels are evident we shall work with the conference organisers to look at alternatives so that a female with the relevant knowledge and expertise can present instead. Where a solution cannot be found, TI-UK will politely withdraw from the event but may highlight the reasons for that as being silent on this topic prevents the change we desire occurring.

Where necessary TI-UK will provide training to employees ensuring that a diverse range of speakers can be promoted as expert subject speakers to conference organisers. We will utilise our networks, including from across the movement to represent our expertise.

### Monitoring

TI-UK colleagues all play a part in monitoring the effectiveness of this commitment. Changes to the policy in light of recommendations will be considered by the SLT.

#NoMoreManels

#Gender Avenger

## Drug Free Workplace Policy (including alcohol and smoking)

Owner:	<b>People Team</b>	Status:	Approved
Last reviewed:	August 2023	Review date:	August 2025
To be read in conjunction with these other policies and procedures:		<ul style="list-style-type: none"><li>• Travel and Expenses Policy</li></ul>	

### The Policy

#### Drugs

Transparency International UK is a drug-free workplace and all efforts are made to enforce this policy. TI-UK employees are required to report to work (in-person or virtually) free from the effects of drugs and alcohol. This policy applies to the period when a TI-UK employee is actively working for TI-UK – at the office or outside – or in public while on TI business out of the office.

Failure to meet this standard may result in disciplinary action.

For the purposes of this policy, ‘drugs’ are defined as: any narcotics, hallucinogens, stimulants, or other substances capable of creating or maintaining adverse effects on an individual’s physical, emotional, or mental condition. This policy applies to both illegal drugs and any drug that meets this description – legal or not.

An illegal drug is any drug which:

- is not legally obtainable
- may be legally obtainable but has not been legally obtained
- is being used in a manner or for a purpose other than for which it was prescribed.

Exceptions to this policy include:

- medicine prescribed for current medical treatment by a licensed health professional where the individual does not intentionally exceed prescribed dosages
- non-prescription medicines used for treatment of health problems where the package instructions are not intentionally violated.

#### Alcohol

Drinking whilst performing TI-UK duties is forbidden. Exceptions are made for official TI-UK events. At such events, TI-UK employees are expected to use alcohol in a responsible manner. TI-UK encourages its employees not to drink during working hours outside of the office unless it is an officially sanctioned social event.

TI-UK will not generally pay for, or reimburse employees for, the costs of alcohol except for official events. This is set out in more detail in the Travel and Expenses Policy.

#### Smoking

In accordance with UK law, TI-UK follows a non-smoking policy within its office premises. E-cigarettes are used by smokers and ex-smokers to help them stay smoke free. Any guidance applicable to use of E-cigarettes in office space or whilst travelling on TI-UK business should be followed.

## Environmental Policy

Owner:	<b>Chief Operating Officer</b>	Status:	Approved
Last reviewed:	August 2023	Review date:	August 2025
To be read in conjunction with these other policies and procedures:		<ul style="list-style-type: none"><li>• Travel and Expenses Policy</li><li>• Procurement Policy</li></ul>	

### Purpose of the document

Transparency International UK has a relatively small environmental impact. This policy is designed to minimise our environmental footprint. The target is 100% compliance in each area listed below.

### The Policy

TI-UK will operate in compliance with all relevant environmental legislation, inform its employees, interns and consultants about environmental issues that may affect their work, and make them aware of the policies in place.

### Energy Use

TI-UK utilise shared office accommodation and so has little direct control over energy use. However, in areas that it is able to control:

- All IT equipment, including printers, monitors and scanners, should be left in the most economical mode overnight.
- Each individual is responsible for shutting down their personal equipment when not in use or at the end of the day.

### Travel

Public transport should be used whenever practicable. The points below are quoted from the Travel and Expenses Policy.

- For journeys to continental Europe, rail travel should be preferred over air travel wherever practicable and if the total journey time is less than eight hours
- For journeys within the UK, the use of trains should be preferred over cars or planes
- Taxis may be used rather than public transport if colleagues are travelling late at night (after 10pm), if public transport is impracticable or if staff perceive a safety risk.

### Procurement

Our policy is that the highest environmental specifications should be sought within the constraints of cost and quality. It is the responsibility of those undertaking the procurement to ensure that they have examined the options and reached a decision based on this environmental policy.

Any printing justified will be sourced from environmentally-friendly printers (e.g. those with ISO 14001, EMAS or equivalent accreditation); all paper must be FSC-certified, recycled or from sustainable sources. Where considerations of cost or quality make this impractical, the paper content should have the highest achievable percentage of sustainable or recycled paper that is possible within the constraints of cost or quality.

In addition:

- The default setting for internal printers should be double-sided.
- All office stationery (e.g. paper for printers) should be procured from environmentally-friendly sources.

### Waste and Recycling

All office waste should be recycled using the bins provided.

Employees are expected to use the bins provided for recycling other waste (e.g. drink and food containers).

Any electronic or IT equipment should be disposed of in the most environmentally-friendly manner that is achievable.

### Reporting

TI-UK will monitor and publish data in our Annual Impact Report and in our Report on Accounts in relation to carbon emissions generated from work related flights and use of office space (energy & water). This will be monitored and reported at the corporate level as well as under each programme. In addition to reporting to our donors under each donor-funded programme, we publicly release our environmental impact as part of the below reports;

- Our environmental impact is published in our **Annual Report and Accounts** on an annual basis.
- Our reporting complements our commitments to the **UN Global Compact** annual Communication on Engagement (COE) and is aligned with its Ten Principles in the areas of Human Rights, Labour, Environment and Anti-Corruption.

## Equal Opportunities and Promoting Diversity

Owner:	<b>People Team</b>	Status:	Approved
Last reviewed:	August 2023	Review date:	August 2025
To be read in conjunction with these other policies and procedures:		<ul style="list-style-type: none"><li>• Recruitment Policy</li><li>• Procurement Policy</li></ul>	

### The Policy

TI-UK does not discriminate in its employment practices on the basis of: gender, race, colour, age, religion, national origin, sexual orientation, pregnancy, marital status, medical condition, veteran status, disability, or any other legally protected category.

TI-UK supports equal employment opportunity, not just because it is the law, but because TI-UK recognises that its present and future strength is based primarily on people, their skills, experience, and potential to develop.

Appointments to all positions will be made on merit. TI-UK is committed to open, fair, and transparent appointment, recruitment, hiring and procurement procedures and practice.

Family members, friends and organisations with which employees, their families or friends are associated, will not be accorded preferential treatment.

If hiring, or contracting with, members of the immediate families of TI-UK employees or the Board of Trustees (such as spouses, partner, parents, children or siblings), TI-UK will follow the guidelines set out in the recruitment policy to ensure non-preferential treatment.

To manage potential conflicts of interest, TI-UK employees will disclose any such connections of which they are aware with potential applicants or candidates. Relevant employees will be recused from any recruitment or contracting process where there is a conflict of interest. TI-UK will ask shortlisted candidates to declare such relations to TI-UK or the Board of Trustees. TI-UK will not usually allow situations to arise in which close relatives or partners are in a direct reporting relationship to one another.

## Flexible Working Policy

Owner:	People Team	Status:	Approved
Last updated:	August 2024	Review date:	August 2026
To be read in conjunction with these other policies and procedures:		<ul style="list-style-type: none"> <li>• Blended Working Policy</li> <li>• Leave Policy</li> </ul>	

### Purpose of the document

TI-UK recognises that requesting a formal change to a working pattern or work location can allow employees to benefit from a positive work-life balance and / or to balance parental and caring responsibilities.

This policy sets out our approach to flexible working arrangements and is in compliance with Statutory Flexible Working legislation and the accompanying ACAS Code of Practice on flexible working<sup>1</sup> effective 6<sup>th</sup> April 2024.

We encourage open discussion, so if you feel you could benefit from flexible working, you can either:

- arrange an informal chat with your line manager or People Team to talk through the options or
- submit a flexible working request by following the steps in this policy.

### What is Flexible Working?

Flexible working is any type of working arrangement that gives some degree of flexibility on how long, where and when an employee works, and different patterns of work.

TI-UK's standard hours are 35 per week /7 hours per day (plus one hour per day for lunch) with core hours of 10.00-16.00. Examples of possible flexible working arrangements are outlined below. However this list is not exhaustive and we recognise that there may be alternatives or a combination of options which are suitable to both the organisation and the employee.

- **Compressed hours:** is when an employee works their contracted hours but over fewer days. TI-UK will not consider less than 4 days for full time roles and 2 days for part time roles.
- **Term-time working:** is considered to be any pattern of less than 35 hours per week.
- **Part-time working:** is when an employee does not work during the school holidays or reduces the contractual hours worked during this time.
- **Job-sharing:** two employees share the duties and responsibilities of one full-time job. Post-holders are able to split the hours of work equally or unequally but TI-UK would usually expect each post-holder to be working at least 14 hours per week (i.e. 2 days).

This is to ensure that regulations are met, as well as ensuring the employee's health and safety.

<sup>1</sup><https://www.acas.org.uk/acas-code-of-practice-on-flexible-working-requests/html>

## The Policy

The Flexible Working (Amendment) Regulations 2023 gives all employees from commencement date of their employment, entitlement to request flexible working. There is no longer a qualifying period of employment.

Flexible working requests can only be made twice within a 12-month period, although only one request can be live at any one time.

Decisions regarding flexible working requests including any appeals must be concluded within 2 months unless an extension is mutually agreed.

## The Procedure

### Submitting a Flexible Working Request

Your request should be submitted using the Flexible Working Request Form (available on Intranet – People Team Resources).

This is then submitted to your line manager. The request form includes the following information:

- the date of the request
- the change you are requesting to the terms and conditions of your employment in relation to hours, times or place of work
- the date you would like the change to come into effect (include an end date if it is for a defined period)
- if and when you have made a previous request for flexible working.

### Reasonable adjustments

TI-UK is committed to reducing and removing disadvantages for employees with a disability. If you need to change where, how or when you work because of your disability, you can request a reasonable adjustment under the Equality Act 2010. For more information on reasonable adjustments refer to the Reasonable Adjustments Guide. If you request a reasonable adjustment, you do not need to also make a flexible working request.

However clearly state if your flexible working request relates to reasonable adjustments.

### Considering the request

When a flexible working request is received TI-UK must follow:

- a statutory request procedure, in line with the ACAS Code of Practice on requests for flexible working
- discrimination law (Equality Act 2010)
- the law on reasonable adjustments, if the request relates to someone's disability (Equality Act 2010)

TI-UK must also comply with working time regulations and our duty of care towards our employees. All requests must therefore ensure that:

- working hours do not exceed 9 hours on any given day



- hours allow for a minimum 20 minutes break for every six hours worked.
- any proposal incorporates a rest period of 11 consecutive hours in every 24 hour period.

### The Needs of the Charity

We recognise the need to balance the demands of working life with other responsibilities and will consider such requests sympathetically, but must also consider the needs of the organisation. TI-UK will therefore take into account a number of criteria including (but not limited to) the following:

- the costs associated with the proposed arrangement
- the effect of the proposed arrangement on other colleagues
- the need for, and effect on, supervision
- the existing structure of the department/ team
- the availability of staff resources
- details of the tasks specific to the role
- the workload of the role
- whether it is a request for a reasonable adjustment related to a disability
- health and safety
- the need for an employee to be present/ available at office space in London/ attending TI-UK events to fulfil their role and collaborate effectively.

Each request will be considered on a case-by-case basis. Agreeing to one request will not set a precedent or create the right for another employee to be granted a similar change to their working pattern.

Your line manager will make a recommendation to your Senior Leadership Team (SLT) Director as to whether or not to approve the request. Your SLT Director will review the recommendation in consultation with the People Team to ensure consistency and fairness.

Where your request can be approved in full without a consultation meeting, your line manager will confirm this to you in writing within 10 working days of receiving the request including details of the new arrangements and may invite you to a meeting to discuss any further information that may be helpful in implementing the new arrangements.

### **Consultation meeting to discuss the request**

- Where your request may be rejected or alternatives offered, your manager must invite you to a consultation meeting within 21 working days of receiving your request. At the consultation meeting your line manager will discuss:
  - the request
  - how the proposed working arrangements might work
  - any potential modifications to the original request,
  - any alternative flexible working options, that may be available and suitable for both sides

- whether a trial period may be appropriate to assess the feasibility of an arrangement.

You will be notified of the time, date and place of the meeting in advance (usually at least 48 hours' notice). If you are unable to attend the initial date, then one further date will be proposed. If an in person or virtual meeting is difficult to arrange then, if agreed by you and your line manager, the meeting may be held over the telephone. At the meeting you may, if you wish, be accompanied by a workplace colleague or trade union official. If you fail to attend the meeting and then fail to attend a rearranged meeting without good reason, the application will be deemed to have been withdrawn.

### **Following the consultation**

After the consultation meeting, your request may be granted in full, in part or refused.

TI-UK may:

- propose a modified version of the request
- grant the request on a temporary basis
- ask you to adopt the flexible working arrangement for a trial period

Where there is some uncertainty as to whether the flexible arrangement is practical for the individual or TI-UK, a trial period of sufficient time to get used to the new arrangement may be undertaken. This can be shortened or lengthened by mutual agreement. At the end of the trial period it may be necessary to revert to the previous working arrangement and four weeks' notice will be provided in such circumstances.

You will be informed in writing of TI-UK's decision as soon as is reasonably practicable, usually within 10 working days of the meeting. This time limit may be extended by mutual agreement between you and your line manager.

Any request that is accepted will normally become a permanent change to the employment contract unless it is clearly agreed as a temporary arrangement.

You will receive any change to your contract in writing within 10 days of this being agreed and a maximum of two months from the date of your request.

### **Rejecting a request**

Where the request is refused or agreed in part, your line manager will write to you to explain the reasons for the refusal which must be based on one of the eight statutory business reasons below:

- the burden of additional costs
- an inability to reorganise work amongst existing colleagues
- an inability to recruit additional staff
- a detrimental impact on quality
- a detrimental impact on performance
- detrimental effect on ability to meet customer demand
- insufficient work for the periods the employee proposes to work
- a planned structural change to the business.

### **Appealing a decision**

You have the option to appeal the decision if your request is refused or is only agreed in part.

You must submit an appeal to the People Team within 5 working days of being notified of a decision. This should be done in writing and clearly state the grounds on which you wish to appeal, these may be, for example, that there is new information you wish to be considered, or you believe TI-UK has not handled your request in a reasonable manner or there is procedural error.

The People Team will make arrangements for the appeal to be heard at an appeal meeting within 10 working days of the appeal being lodged and you will be informed of the outcome to your appeal in writing within 5 working days of the appeal meeting. These time limits may be extended with the agreement of both you and the manager hearing the appeal. You may, if you wish, be accompanied to the appeal meeting by a work colleague or trade union official.

In situations where the grounds of appeal are clearly laid out and there is no need for further information or clarification the appeal may be conducted as a desktop exercise without the need for a meeting. In this case you will be informed of the outcome within 10 working days of the appeal being lodged.

The decision of the manager hearing the appeal will be final and will conclude the process.

### **Trialling New Working Arrangements**

Where it may not be clear whether the arrangements requested are sustainable the arrangement may be trialled on a temporary basis. Trial periods can be established for up to six months (or up to 12 months for term-time working requests). Extensions to the trial may be agreed if there are strong business reasons (for example to amend the arrangement, or if TI-UK's situation changes during the course of the trial) but it should not normally continue for more than 12 months.

Details of the trial period and any extension must be confirmed in writing and review points should be set to jointly discuss how the new arrangements are working and make any adjustments necessary. If the trial is successful, the arrangement will be confirmed as permanent and you will receive a change to their terms and conditions in writing. If a trial period is not successful you will return to your substantive working pattern. If you wish to appeal refer to the above section.

### **Ending a Flexible Working Arrangement**

Since a permanent flexible working arrangement constitutes a change in contractual terms and conditions, there is no automatic right to return to previous working patterns once the flexible working arrangement has been agreed. Any request to end the arrangement will be considered as a new request subject to this policy.

A flexible working arrangement agreed for a defined period is not subject to this clause.

## Grading and Remuneration Policy implementation guidelines<sup>1</sup>

Owner:	<b>Chief Executive</b>	Status:	Approved
Last reviewed:	February 2023	Review date:	February 2025
To be read in conjunction with these other policies and procedures:		<ul style="list-style-type: none"> <li>• Remuneration Policy</li> <li>• Equal Opportunities Policy</li> <li>• Recruitment Policy</li> <li>• Standard Terms and Conditions</li> <li>• Leave Policy</li> <li>• Salary bands</li> <li>• Grade descriptors</li> </ul>	

### Purpose of the document

This document sets out the implementation of the Remuneration Policy which has been delegated by the Board to the Chief Executive. The policy outlines how grading decisions for roles are undertaken and how remuneration for individuals is agreed. The specific details of the grades and the attached pay bands at any given time are available from the People team and are stored on the shared drive. They are confidential documents for internal use only.

### Grading

TI-UK grades posts (jobs) and not the person who holds any particular post at any given time.

TI-UK operates a simple grading system containing seven grades, along with some subgrades. All posts are placed in a grade prior to recruitment, based on a job description which spells out the requirements of the post and the qualifications/experience needed by any applicant.

The detailed description of the grades includes the key features of each grade and the factors that differentiate between grades.

Posts remain in the grade to which they were originally assigned unless they are re-graded as described below.

### Re-evaluation / Re-grading of roles

It is recognised that a role can grow substantially in scope over time, or in exceptional situations that a role may not have previously been appropriately graded. In either case, a request can be made for re-evaluation / re-grading of the role. Any employee may request for their role to be re-evaluated / re-graded. Their line manager / director must agree that there is a case for the role to go through a re-evaluation / re- grading exercise before it can be presented to the People team.

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<sup>1</sup> Note: the Board's Remuneration Finance, Risk and Audit Committee sets the overall Remuneration Policy; this document is entitled 'implementation guidelines' to differentiate it from the Board's role in setting the overall direction.

There are two points in the year when the re-evaluation / re-grading exercise takes place, typically in April and October. As part of organisational change management, job descriptions and roles may be reviewed and re-graded outside of these times.

The line manager of the post will be required to prepare a revised job description as per the recruitment policy, which has to be approved by their director. Once approved this will be sent to the People team, along with the current job description and any other documents that the line manager wishes to submit (not required). The deadlines for submissions are currently 1<sup>st</sup> April and 1<sup>st</sup> October of each year. When the required documents have been received, the Business Partners will conduct an in depth review of all paperwork and arrange to meet with the line manager / programme director as appropriate to seek clarification or further information. The People team will then undertake a job re-evaluation exercise and assess the new job description on the basis of:

1. Change in scope of responsibility and the extent to which this impacts on the role
2. Change in new skills required for the new role
3. Change in complexity of the role
4. Change in line management responsibility
5. Comparison with the job descriptors for the proposed grade
6. Comparison between current and proposed Job Descriptions
7. Comparison with similar grades / roles within TI UK
8. The rationale given by the line manager / departmental head / programme director
9. The role and not the role holder.

The People team will submit Job Re-evaluation / Regrading Outcomes and Recommendations to the SLT for endorsement.

The recommendations from the People team may be that:

- the increase in scope is substantial enough for the role to be re-graded to a higher grade
- the job has not significantly grown in scope and therefore remains in the same grade
- the post has increased in scope but not substantial enough to regrade it, but a change in job title may be appropriate where that is possible within the same grade

The SLT may decide:

- to endorse the recommendations from the People team
- the charity's financial circumstances require a freeze on additional salary costs
- there are exceptional circumstances that warrant postponing the approval of a particular role.

In recommending the level of salary the People team will ensure that the new salary is commensurate with other jobs in the new grade, across the organisation. The default position will be to offer the first step of the new grade. Where this will be below a 5% increase, and in exceptional circumstances, a recommendation will be made above step 1 in line with the salary on recruitment principles.

The SLT will consider the outcomes and recommendations and reach a final decision. A re-graded post shall be considered to have moved to the higher grade at the start of the month following the approval and the post-holder will from that date be eligible for remuneration at the new level.

No post-holder will have their remuneration reduced as a result of a re-grading.<sup>2</sup>

Should there be unavoidable delays in the re-grading process, any pay increase may be back-dated to an agreed date.

Employees and their line managers requesting a re-grade should be aware that requests are not automatically approved, and there may be a good reason for not approving a request or postponing a decision.

#### Re-evaluation / Re-grading Appeals Process

Where an individual is not content with the outcome of their request for a re-grade or the level of salary awarded to the new grade they should take the matter up initially with the People team, who will arrange a meeting to listen to their concerns, and will subsequently respond to their concerns in writing.

Should the individual's concerns remain, then they may appeal in writing to the Chief Operating Officer, whose decision will be final. The basis of the appeal is if the individual feels that the policy and specific criteria have not been applied. This must be set out specifically in writing.

#### Remuneration

TI-UK applies a pay band to each grade. Most of these bands overlap to some extent. All employees will receive a salary within the band for their grade. The pay bands in force at any given time are available from the People team and are stored on the shared drive.<sup>3</sup>

Each grade is sub-divided into a number of 'steps' which give a clear pathway of annual salary progression over and above a cost of living increase.

The starting point of grade 1 will not be allowed to fall below the London Living Wage.

#### Salary on recruitment

New employees, or those moving jobs within the organisation, will normally be recruited at the commencing salary of the applicable pay band. While the recruiting manager has the discretion to negotiate a starting salary up to step 4 of the grade, this will only be exercised in exceptional circumstances and taking into account salary comparability across the organisation with similar roles. TI-UK particularly wishes to ensure that existing employees are not disadvantaged by the award of higher salaries to new external recruits, given that the pressure to make an appointment may lead to a tendency to a salary that is distortive in the context of what other employees are paid.

The Chief Executive will need to approve any starting salary above that point and requested by the relevant Director through the People team. They may wish to consult with SLT before doing so.

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<sup>2</sup> In exceptional circumstances, it is possible that an employee may request a down-grading of their role, in which case the salary would be adjusted accordingly.

<sup>3</sup> These are confidential internal documents and it is a disciplinary offence to share, circulate or disclose them externally.

Recruiting managers must carry out any salary negotiations in liaison with the People team, who will ensure compliance with this policy and advise on precedents elsewhere in TI-UK.

The Finance, Risk and Audit Committee will review all new salaries for senior employees (grade 6) and the Nominations and Governance Committee will approve the salary of the Chief Executive.

Posts will normally be advertised in a salary range from the bottom of the band to step 3 of the band. Any exceptions to this will be agreed in advance by the People team in consultation with Chief Operating Officer.

### Cost of Living Increases

At the beginning of each financial year, TI-UK may award all employees a Cost of Living (CoL) increase. Such an increase is applied to the overall pay band and not on an individual basis (the pay band and steps move up by an agreed percentage or amount).

The level of the CoL increase will be recommended by the SLT to the Finance, Risk and Audit Committee of the Board for approval. In making the recommendation SLT will consider: prevailing inflation rates; and affordability for TI-UK.

All employees of TI-UK at the time of a CoL award will be eligible to receive that award, regardless of length of service or type of contract.

### Advancement within pay bands

In addition to CoL, all employees with sufficient length of service may expect to be awarded an annual increment within their pay band. TI-UK has divided each band into eight increments or 'steps' and all eligible employees will receive an increment as part of the annual pay award. This applies to all bands, including senior employees.

Employees will only be eligible for any increase over and above the CoL if they meet all of the following conditions as at 1<sup>st</sup> April of each year:

- They have been employed or in their current post for a period of 6 months
- They have satisfactorily completed their probationary period
- They are not currently under capability management or disciplinary procedures
- They have an up to date appraisal and set of objectives agreed with their line manager and have completed the same with all those they line manage.

Anyone who is on capability management is eligible for the increment rise once they are no longer on capability management. The increase will take effect from the 1<sup>st</sup> of the month following confirmation of this. They would still be eligible for a CoL increase during this time.

TI-UK does not operate a system of performance based pay awards.

In exceptional cases the Chief Executive, in consultation with the SLT, has the discretion to vary this process.

### Affordability

TI-UK's funding, like that of many charities, is cyclical and not guaranteed. While TI-UK is strongly committed to providing annual increases, both the CoL and step-based increase are subject to an affordability check. The Board in approving the Annual Plan and Budget will ultimately decide each year which increases, if any, the charity can afford. No increase is therefore guaranteed.

### Changing posts

Should an employee move, through internal recruitment not re-grading, from one post to a different post in either the same they will retain their current pay level. If they move to a higher grade they will be placed on a step within that grade that will give them a minimum of a 5% increase.

Employees moving into a higher grade post will be paid in line with the salary on recruitment principles but will not have their salary reduced as a result of the change.

Where an employee moves into a new post and are currently receiving a salary greater than the top of the new pay band, then their pay will be frozen (apart from CoL increases) until they fall within the band.

### Acting Up Allowance

Should an employee be formally asked to 'act up' temporarily in a more senior role, they will be paid at the commencing level of the pay band applicable to that role. Should that salary be less than they are currently earning, they will be placed on the next step within the higher grade. If an employee is only required to undertake some, but not all of the duties and responsibilities of the higher graded role, an allowance of a smaller sum may be more appropriate. The People team will agree what this sum will be using the % of additional duties as a guide.

Any salary increase will only apply for the time in which the employee is acting up.

The term 'acting up' does not include providing occasional cover for a colleague who is absent on annual or short term sick leave but applies when someone is providing cover for a minimum of four weeks. The 'acting up' period will normally not exceed six months, except in exceptional circumstances (for example maternity/ paternity cover). Management will formally notify any employee who is being asked to act up.

If more than one person would be suitable to act up in to the role, then the manager should seek expressions of interest from the appropriate pool of employees and make a selection via an informal interview.

### Benchmarking

TI-UK wishes its salaries to be competitive with comparable organisations. To that end, salaries are benchmarked against the market approximately every three years using either publicly-available data or the services of a professional HR firm.<sup>4</sup>

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<sup>4</sup> The last benchmark took place in Autumn 2022 and the data used was Croner (XPERTHR on last occasion in 2019) charity data for income between £5-£10m. The benchmark provided data for London (inner and greater) as well as national and considered differences in international charities



The Board has agreed that TI-UK's salaries should be set at the mid-point of the benchmark equivalents.

#### Other remuneration

TI-UK does not offer paid overtime, although the provisions for Time Off in Lieu (TOIL) in the Leave Policy are relevant.

#### The Reward Package

Pay is just one element of the TI-UK reward package that also includes:

- Pension with matched contributions
- Enhanced Maternity/Paternity/Adoption/Shared Parental Leave Policy
- Enhanced Sick Pay
- Annual leave of 28 days plus statutory public/ bank holidays
- Flexible working
- Season Ticket Loan/ Cycle to Work
- Employee Assistance Programme (Health Assured)
- Training and Development

#### Confidentiality

The following information is accessible to all employees via the People team and on the shared drive:

- The grade attached to each post
- The pay bands attached to each grade

The following information is confidential to the individual, their manager(s) and the People team:

- Individual salary levels

Employee should be aware, however, that the process of preparing budgets, especially for external donors, may result in their salary becoming more widely known.

## Grievance and Disciplinary Procedures

Owner:	<b>People Team</b>	Status:	Approved
Last reviewed:	May 2024	Review date:	May 2026
To be read in conjunction with these other policies and procedures:		<ul style="list-style-type: none"><li>• Anti-Bullying &amp; Harassment Policy</li><li>• Whistle-blowing Policy</li><li>• Anti-Bribery Policy</li><li>• Anti-Fraud Policy</li><li>• Capability Policy &amp; Procedure</li><li>• Safeguarding Policy</li></ul>	

### Purpose of the document

This document sets out the procedures to be followed in the event that an employee wishes to raise a grievance against another colleague or where disciplinary charges are being levied against an employee.

### Grievance Procedure

If you have a concern, problem or complaint at work, you should take this up according to this procedure. This is called raising a grievance. Legitimate reasons for raising a grievance would include:

- things you are being asked to do that are demonstrably outside your job description
- breaches in your terms and conditions of employment
- discrimination at work because of your race, age, disability or sexuality etc.
- bullying or harassment by a line manager or colleague.

If you have a grievance relating to your employment or the behaviour of a colleague or manager, you should first seek to resolve this informally.

If informal approaches cannot resolve the issue you should first discuss it with your line manager (see Annex A). If for some reason you feel it inappropriate to raise your grievance with your line manager, you should refer it to the People team, who will liaise with the appropriate managers to find a suitable solution.

### Formal hearing

In the event that such grievance cannot be informally resolved, you have the right to raise the issue formally. This will require you to put your grievance in writing. TI-UK will expect to see in the written submission some evidence that informal approaches have been made prior to registering a formal grievance.

The People Team will determine to whom you should present your grievance in writing. The appointed individual will invite you to attend a meeting (at which you may be accompanied by a colleague or a trade union representative) to discuss your grievance.

You will be informed within two weeks of the meeting of the response to your grievance and what action is being taken.

## Appeals

If you remain dissatisfied, you are entitled to appeal. The People Team, in consultation with the Chief Executive (or, if necessary, the Chair of the Board) will determine who should hear the appeal; any appeal must be in writing, must make clear the grounds of the appeal and must be made within seven working days of the appointed individual's response to your initial grievance.

Whoever is hearing the appeal will invite you to attend a further meeting to hear your appeal and you may be accompanied by a colleague or a trade union representative; the appointed individual for the original hearing will be entitled to be present at the hearing to explain the reasons for his/her decision.

The decision of the appeal hearing is final.

## Confidentiality and Reprisals

TI-UK will maintain confidentiality around any grievance procedure – formal or informal – in so far as that is compatible with conducting a reasonable investigation and its legal obligations.

No one shall be discriminated against, victimised, disciplined or reprimanded for reporting concerns in good faith. If, however, an individual makes malicious or vexatious allegations, and particularly if they persist with making them, disciplinary action may be taken against that individual.

## Disciplinary Procedure

TI-UK expects its employees to act in a professional manner having regard to the ethical values that it espouses. Disciplinary action may follow any breach of these standards. Disciplinary offences may include but are not limited to:

- A breach of TI-UK's Anti-Bribery Policy
- A breach of TI-UK's Safeguarding Policy or Code of Conduct
- A breach of TI-UK's Anti-Fraud Policy
- Inappropriate behaviour as defined in the Anti-Bullying and Harassment Policy
- Failure to adhere to TI-UK's Whistle-blowing Policy
- Failure to carry out your role as described in your job description to an acceptable standard.

Certain offences may be considered to fall into the category of gross misconduct and may lead directly to dismissal and/or referral to the appropriate public authorities. These include, but are not limited to:

- Theft, fraud, giving or receiving a bribe
- Abuse of a vulnerable adult or child
- Violent behaviour at work
- Working whilst under the influence of alcohol or illegal drugs
- Serious misuse of TI-UK assets, such as downloading pornography.

If your line manager is of the opinion that there has been a breach of duty, misconduct, inefficiency or incompetence on your part, there may be an informal discussion to attempt to resolve the issue. This may result in a verbal warning that repetition of such conduct could lead to further disciplinary action, including dismissal.

### Formal hearing

Before any formal disciplinary action is taken, you will be given notice in writing of the complaint against you and you will be given an opportunity to attend a hearing (at which you may be accompanied by a colleague or trade union representative) to put forward your case. The hearing will be normally be conducted by your line manager or, if this is not appropriate, by a manager appointed by the People Team and/or the Chief Executive.

If the hearing finds that you have committed a disciplinary offence, the following actions may be taken by TI-UK depending on the severity of the offence and whether or not it is a first occurrence:

- a written warning that repetition of such conduct will lead to further disciplinary action
- a final written warning that any repetition will lead to dismissal
- dismissal

Warnings may include a requirement for specific remedial action(s).

In the event of a serious offence such as acts of gross misconduct, TI-UK may move immediately to dismissal.

Following the hearing, the convenor will notify you of the decision, and take any disciplinary action necessary. A record of that action will be placed on your personnel file.

### Appeals

You are entitled to appeal against any disciplinary decision. The People Team, in consultation with the Chief Executive (or, if necessary, the Chair of the Board) will appoint an individual to hear the appeal and inform you accordingly.

You must present your appeal in writing within seven working days of the decision. You must clearly state the grounds on which you are appealing.

A meeting will be held to hear your appeal at which you will be entitled to be present and may be accompanied by a colleague or trade union representative. You will receive at least 48 hours' notice of this meeting. The convenor of the original hearing will be entitled to be present to explain the reasons for the original decision.

The decision of the appeal hearing is final.

### Suspension from duty

TI-UK may, at its discretion, and at any point during the investigation and appeal process, suspend you from the performance of any or all of your duties and direct that you do not attend the offices of TI-UK/ attend virtually. During such a period your salary and any other benefits will continue to be paid.

## ANNEX A: Conflict in the Workplace Procedure

Disputes at work amongst and between colleagues can occur at any time. They are an inherent aspect of the workplace with procedures in place to recognise and help resolve them.

It is not always easy to pinpoint when a disagreement becomes a conflict because of the different ways that people react. But there are distinct stages in the lifecycle of conflict, where they will display certain common behaviours. It can be helpful to recognise these and understand where you think things are with your problem / issue.

### The Conflict Lifecycle

Stage of Conflict	Behaviour or signs
Beginning	<ul style="list-style-type: none"> <li>• Incompatible goals</li> <li>• Open or covert conflict</li> <li>• Avoidance of conflict</li> <li>• Tension starts to be noticed</li> </ul>
Early Growth	<ul style="list-style-type: none"> <li>• Confrontation</li> <li>• Polarisation of positions</li> <li>• Seeking allies</li> <li>• More overt signs of conflict</li> </ul>
Deadlock	<ul style="list-style-type: none"> <li>• Conflict at its peak</li> <li>• Blame apportioned</li> <li>• Communications cease between parties</li> <li>• Entrenched positions</li> </ul>
Looking for a way out of the conflict	<ul style="list-style-type: none"> <li>• An acceptance that the problem needs to be sorted out</li> </ul>
Working together for a solution	<ul style="list-style-type: none"> <li>• Collaborating</li> <li>• Consensus</li> </ul>

Many disputes could potentially be settled without the need to pursue a formal grievance procedure. Once formal procedures have been triggered, the tendency is for differences to become more adversarial. Once the conflict has escalated and positions have become entrenched, it is very difficult to alter people's perceptions and have an open discussion. The likelihood of a mutually acceptable outcome then becomes more remote.

### First Steps

When an issue arises the first steps are:

1. **Check the TI-UK Policy** relevant to your issue (s). This helps you decide information on resolving the problem and who to speak to if you need help with that.
2. **Next talk to a work colleague about this** – your line manager, another manager or the People team.
3. **Get any support you require** – this could from the People team, the Employee Assistance Programme, your trade union representative, your GP or a mental health advisor.

When you let us know as employer that there is a problem, an informal meeting will take place. This allows us to find out more about the issue and talk to you about the best way to resolve the problem. We may request that this is best to take place in-person.

The actions that can arise from this conversation could be:

- i. You agree to monitor the situation and if further negative behaviour or conduct occurs then this will be discussed further. The People team will keep a note of such situations so that if patterns of behaviour are seen affecting different people then this can be considered.
- ii. A quiet word with the other person to discuss the problem will take place. Often this is enough to resolve matters, especially if someone has upset you without meaning to. It will be agreed who is best to undertake this.
- iii. Holding an informal meeting with you and the other person. This would be agreed in advance and allow both parties to prepare for it. We would generally request that this take place in-person.

Throughout these actions the People team are available to provide guidance and support. They will not themselves plan to undertake these steps. If these first steps do not resolve a matter then mediation could be considered.

### What is mediation?

*“Mediation is where an impartial third party, the mediator, helps two or more people in dispute to attempt to reach an agreement. Any agreement comes from those in dispute, not from the mediator. The mediator is not there to judge, to say one person is right and the other wrong, or to tell those involved in the mediation what they should do. The mediator is in charge of the process of seeking to resolve the problem but not the outcome.”*

It is very important for parties in conflict to understand what mediation is. If they enter the process not supportive of these aspects it is likely that the mediation will fail and the conflict will become deadlocked.

### When can mediation be used?

You can use mediation to resolve:

- bullying and harassment
- communication problems
- personality clashes
- relationship breakdowns

Mediation is voluntary and confidential. The mediator will agree with everyone involved what information can be shared outside the mediation and how. If you do not reach an agreement, anything that's been said during the mediation must be kept confidential and cannot be used in future procedures.

Mediation is not to be used by a manager to avoid their managerial responsibilities. It cannot be used if a decision about right or wrong is needed or if the individual bringing a discrimination or harassment case wishes it to be investigated. It cannot be used if someone has learning difficulties that would impair their ability to make an informed choice or where the individual is particularly vulnerable. It would be inappropriate where one side is completely intransigent and using mediation will only raise unrealistic expectations of a positive outcome.

In addition to early-intervention, mediation can also be used to help rebuild trust after a disciplinary or grievance procedure.

### What can mediation achieve?

Each conflict is unique and therefore the outcome to be reached will reflect that. Possible outcomes could include:

- i. an acknowledgement of each party's views – issues, feelings and concerns

- ii.a commitment to change behaviour- recognising and empathising with the negative feelings the dispute has caused one or both parties
- iii.a commitment to regularly review the agreement reached and find ways in which the parties can resolve difficulties between themselves if they arise in the future
- iv.an agreement to review policies and procedures, ways of working, how decisions are reached and communicated, how workplans are agreed and monitored etc
- v.an agreement to share work more fairly and provide more responsibility

#### How will TI-UK organise mediation?

The People Team will co-ordinate any mediation. When both parties have agreed they are willing to accept mediation the following principles will guide the arrangements.

#### The role of the mediator is to:

- i.play an active role in guiding the process.
- ii.ask questions to identify the interests and real issues of disagreement.
- iii.help the parties involved to identify and evaluate options for resolution and settlement. The mediator does not suggest solutions, although they may float ideas.

#### Stages of Mediation

**Stage 1-** First contact with the parties – the mediator will meet parties separately. The aim of this first meeting is to allow each individual involved to tell their story and find out what they want out of the process.

#### **Stage 2-** Joint Meeting

- **Hearing the issues** – the mediator generally brings the participants together and invites them to put their side of the story during a period of uninterrupted time. At this stage the mediator will begin to summarise the main areas of agreement and disagreement and draw up an agenda with the parties for the rest of the mediation.
- **Exploring the issues** – having identified the issues to explore, the mediation is now about encouraging communication between the parties, promoting understanding and empathy and changing perceptions. The aim of this part of the meeting is to begin to shift the focus from the past to the future and begin to look for constructive solutions.
- **Building and writing an agreement** – as the process develops, the mediator will encourage and support joint problem-solving by the parties, ensure the solution and agreements are workable and record any agreement reached.
- **Closing the mediation** – once an agreement has been reached, the mediator will bring the meeting to a close, provide a copy of the agreed statement to those involved and explain their responsibilities for its implementation. In some cases no agreement is reached and other procedures may later be used to resolve the conflict. However, nothing that has been said during the mediation can be used in future proceedings.

Discussions at stage 2 will generally take place jointly but the mediator may decide that shuttle mediation where the parties are not sitting in the same room but where views are relayed can help assist with bottlenecks or where a party is not comfortable divulging information.

#### Confidentiality

Anything said during the mediation is confidential to the parties, and anything said that the parties would not otherwise have known cannot be used in any other context. They may choose to reveal some or all of what has occurred during the mediation to colleagues, or their managers, but only if all

parties agree. Typically this agreement to share would cover situations where others need to be involved as part of the agreement, for example if a manager needs to agree training. To assist with confidentiality, the mediation discussions will normally be arranged at a location where other colleagues will not be present.

#### Selection of mediator

As a small organisation and given that mediation is a confidential process it may be best for the mediator to be external to the parties involved.

Where an internal mediator is used, the most important consideration is the impartiality of the individual selected to the parties involved. Where either party is not comfortable with the internal mediator they can suggest suitable alternatives for consideration.

As the People Team play a role in disciplinary and grievance procedures in most cases they will be unable to act in the role of mediator.

TI-UK in selecting the mediator will seek to balance time commitment, costs, and speed of availability, cultural fit, experience / training and any other key determinants relevant to the conflict.

#### Guidance

ACAS: <https://www.acas.org.uk/mediation>

CIPD: <https://www.acas.org.uk/sites/default/files/2021-03/mediation-an-approach-to-resolving-workplace-issues.pdf>



## Health and Safety Policy

Owner:	<b>Chief Operating Officer</b>	Status:	Approved
Last reviewed:	November 2023	Review date:	November 2025
To be read in conjunction with these other policies and procedures:	<ul style="list-style-type: none"><li>• Security policy</li></ul>		

### Policy Statement

Transparency International UK recognises and accepts its health and safety duties for providing a safe and healthy working environment.

that it has responsibilities for the health and safety of our workforce whilst at work and others who could be affected by our work activities. We will assess the hazards and risks faced by our workforce in the course of their work and take action to control those risks to an acceptable, tolerable level.

Our managers and supervisors are made aware of their responsibilities and required to take all reasonable precautions to ensure the safety, health and welfare of our workforce and anyone else likely to be affected by the operation of our business.

This business intends meeting its legal obligations by providing and maintaining a safe and healthy working environment so far as is reasonably practicable. This will be achieved by;

providing leadership and adequate control of identified health and safety risks;

consulting with our employees on matters affecting their health and safety;

providing and maintaining safe plant and equipment;

ensuring the safe handling and use of substances;

providing information, instruction, training where necessary for our workforce, taking account of any who do not have English as a first language;

ensuring that all workers are competent to do their work, and giving them appropriate training;

preventing accidents and cases of work-related ill health;

actively managing and supervising health and safety at work;

having access to competent advice;

aiming for continuous improvement in our health and safety performance and management through regular (at least annual) review and revision of this policy; and

the provision of the resource required to make this policy and our health and safety arrangements effective.

## The Policy

TI-UK will operate in compliance with all relevant environmental legislation, inform its employees, interns and consultants about environmental issues that may affect their work, and make them aware of the policies in place.

## Energy Use

TI-UK utilise shared office accommodation and so has little direct control over energy use. However, in areas that it is able to control:

- All IT equipment, including printers, monitors and scanners, should be left in the most economical mode overnight.
- Each individual is responsible for shutting down their personal equipment when not in use or at the end of the day.

## Travel

Public transport should be used whenever practicable. The points below are quoted from the Travel and Expenses Policy.

- For journeys to continental Europe, rail travel should be preferred over air travel wherever practicable and if the total journey time is less than eight hours
- For journeys within the UK, the use of trains should be preferred over cars or planes
- Taxis may be used rather than public transport if colleagues are travelling late at night (after 10pm), if public transport is impracticable or if staff perceive a safety risk.

## Procurement

Our policy is that the highest environmental specifications should be sought within the constraints of cost and quality. It is the responsibility of those undertaking the procurement to ensure that they have examined the options and reached a decision based on this environmental policy.

Any printing justified will be sourced from environmentally-friendly printers (e.g. those with ISO 14001, EMAS or equivalent accreditation); all paper must be FSC-certified, recycled or from sustainable sources. Where considerations of cost or quality make this impractical, the paper content should have the highest achievable percentage of sustainable or recycled paper that is possible within the constraints of cost or quality.

In addition:

- The default setting for internal printers should be double-sided.
- All office stationery (e.g. paper for printers) should be procured from environmentally-friendly sources.

### Waste and Recycling

All office waste should be recycled using the bins provided.

Employees are expected to use the bins provided for recycling other waste (e.g. drink and food containers).

Any electronic or IT equipment should be disposed of in the most environmentally-friendly manner that is achievable.

### Reporting

TI-UK will monitor and publish data in our Annual Impact Report and in our Report on Accounts in relation to carbon emissions generated from work related flights and use of office space (energy & water). This will be monitored and reported at the corporate level as well as under each programme. In addition to reporting to our donors under each donor-funded programme, we publicly release our environmental impact as part of the below reports;

- Our environmental impact is published in our **Annual Report and Accounts** on an annual basis.
- Our reporting complements our commitments to the **UN Global Compact** annual Communication on Engagement (COE) and is aligned with its Ten Principles in the areas of Human Rights, Labour, Environment and Anti-Corruption.

## Internship Policy

Owner:	<b>People Team</b>	Status:	Approved
Last reviewed:	August 2023	Review date:	August 2025
To be read in conjunction with these other policies and procedures:		<ul style="list-style-type: none"><li>• Leave Policy</li></ul>	

### The Policy

#### Motivation and Values

Participants in the internship programmes at TI-UK should share and support the vision, mission and values of TI-UK and the TI movement.

#### Benefits and content of Internships

Both TI-UK and the intern should benefit to the greatest extent possible from the internship. TI-UK will offer a fair range of tasks for the intern to carry out.

Generally, internships will include a combination of:

- substantive project work to be carried out as autonomously as possible and over an extended period of time;
- standard office work (correspondence, editing of articles for TI-UK publications, etc.), as instructed by the responsible manager;
- secretarial/administrative work.

The exact nature of an individual internship will be agreed with the intern's line manager, while the exact activities and projects eligible for internships will depend on the specific needs of project and other functional teams at TI-UK.

TI-UK will not use internships to substitute for substantive, longer term posts.

The term 'internships' is not intended to cover unpaid work experience which TI-UK may also occasionally offer.

#### Supervision

Responsibility for managing the internship will rest with the line manager.

The line manager will function as a mentor responsible for departmental induction and will oversee the work of the intern. They will also coordinate any tasks that may be given to the intern by other colleagues. The mentor will introduce the intern to all colleagues working at TI-UK and will be the first person the intern can turn to with any questions or complaints they may have.

#### How to apply

Announcements of internship programmes will be posted on the TI-UK website and may also be advertised in various other ways.

### Start and Duration

Internships normally last up to six months. In some cases, the duration can be extended by mutual agreement between TI-UK and the intern, provided no internship exceeds nine months.

### Remuneration

TI-UK will remunerate interns who are appointed for six months at a level at least equal to the London Living Wage. Occasionally shorter unpaid internships or work experience may be offered.

### Notice Period

Internship contracts will state a notice period to be given by either the intern or TI-UK.

### Leave

Interns should inform their line manager immediately (i.e. the same day) should they be unable to work. Provision for leave is as for employees and is included in the Leave Policy.

### Review of the internship

Interns and the team(s) in charge of the internship will discuss the experience gained during the internship on both sides at the end of the intern's term. The conversation is aimed at learning from the insight an outsider has gained into TI-UK's work, to voice useful criticism, to redress potential grievances in the future and to further improve management.

On request, interns may receive a letter of reference at the end of their internship.

## Leave Policy

Owner:	<b>People Team</b>	Status:	Approved
Last reviewed:	August 2021	Review date:	September 2024
To be read in conjunction with these other policies and procedures:		<ul style="list-style-type: none"> <li>• Capability Policy &amp; Procedure</li> <li>• Flexible Working Policy</li> </ul>	

### Purpose of the document

TI-UK recognises the Health and Wellbeing of their people. This policy outlines the range of leave entitlements available for TI-UK employees. Details include entitlements, how payments will be calculated, and the process for approving and recording of leave.

### Annual Leave

The TI-UK annual leave year runs from 1<sup>st</sup> January to 31<sup>st</sup> December. Every full-time employee is entitled to 28 days of leave per annum accrued on a monthly basis. Part-time employees' leave entitlement is *pro rata* based on hours worked. Employees are also entitled to paid bank holidays when these fall on normal working days. Annual leave entitlements begin on the first day of employment regardless of any probationary arrangements. (Other leave arrangements may be subject to qualifying conditions, see below.)

To ensure that part-time employees are not treated less favourably in their entitlement, TI-UK will apply an equitable calculation. Details are available from the People team.

Leave dates must be agreed with your line manager in advance. Employees are expected to give reasonable notice that will allow for any changes in work plans to be made. Leave requested at very short notice may be refused. Requests for more than 15 days of consecutive leave will require approval by the Chief Operating Officer.

You may carry forward up to five days of unused annual leave. For more than five days, the approval of the Chief Operating Officer is needed and will only be granted in exceptional circumstances and where you have taken a minimum of 20 days. Any leave carried over from a previous year must be used by 30<sup>th</sup> April of the following year or it will be forfeited.

Any agreed leave needs to be logged and approved in advance on TI-UK's HR System.

### Annual leave entitlement during the probationary period.

Annual leave entitlement commences from the first day of employment. The maximum annual leave granted prior to confirmation in employment during a three-month probationary period is six days (*pro rata* for part-time employees). The maximum paid annual leave granted during a six-month probationary period is 12 days. Where unpaid leave is taken during the probationary period, the probationary period will be extended by the corresponding number of days.

### Annual leave on termination of employment

On departure from your employment with TI-UK will pay any accrued leave not taken where it is not possible to take the leave during notice period due to operational requirements. For leave taken in advance of its accrual, TI-UK reserves the right to deduct the relevant amounts from the final salary payment. TI-UK reserves the right not to approve additional leave during a notice period.

### Winter Closure

Subject to operational requirements, our office will normally close between Christmas and New Year. These days are in addition to your annual leave and are given at discretion. The People team will confirm these days by the end of February each year.

### Jury Service

In the event that an employee is required to be absent for jury service, TI-UK will pay their normal salary, plus any normal allowances, less the daily allowance paid by the court. On no occasion will an employee be financially disadvantaged.

### Maternity Leave

All pregnant employees are entitled to take 52 weeks' statutory maternity leave around the birth of their child regardless of the number of hours worked per week. Statutory leave consists of 26 weeks 'ordinary' maternity leave followed by 26 weeks 'additional' maternity leave, giving a total of 52 weeks: the 'maternity leave period'.

Any pregnant employee has the right to reasonable paid time off to attend ante-natal care. TI-UK may ask that you provide evidence of appointments.

Except for the terms below relating to pay, the terms and conditions of employment which would have applied to you had you been at work continue through the maternity leave period unless either TI-UK or you expressly ends the contract or it expires.

Maternity leave shall commence no earlier than 11 weeks before the Expected Week of Childbirth (EWC), or from the day following childbirth if that is earlier. Maternity leave will also automatically start if you are off work for a pregnancy-related illness in the four weeks before the week your baby is due. TI-UK will write to the employee confirming the last day of their maternity leave and the expected date of their return.

Note: 'childbirth' means the live birth of a child, or a still birth after a pregnancy lasting at least 24 weeks.

### Compulsory Maternity Leave

An employee must take a minimum of two (2) weeks' leave after the birth of her child.

### Keeping in Touch (KIT) Days

During the maternity leave period TI-UK will maintain reasonable contact with you and it is hoped that you will keep contact with TI-UK.

Up to ten (10) KIT Days can be worked, by mutual agreement, during the maternity leave period without affecting your SMP or maternity leave. These will be agreed, as far as possible, before the commencement of your maternity leave and will be paid at your normal rate of pay. If you only work part of a day this would still count as one of your ten KIT days.

You will not be paid Statutory Maternity Pay (SMP) for any work done in any week if you have already worked 10 KIT days during your SMP period.

### Maternity Pay

A pregnant employee qualifies for Statutory Maternity Pay (SMP) provided that:

- She has at least 26 weeks' continuous service with TI-UK at the 15th week before the EWC
- She continues to be employed by TI-UK until 11 weeks before the expected week of childbirth
- She produces a MATB1 form from her doctor or midwife to confirm that she is pregnant at least 15 weeks before she wishes to start her maternity leave
- She gives TI-UK at least 28 days' notice confirming that she is pregnant and the day she wishes SMP to start
- Her average weekly earnings are at or above the lower earnings limit for National Insurance Contributions.

TI-UK offers enhanced maternity pay rates as follows:

- Six weeks on full pay inclusive of any Statutory Maternity Pay (SMP)
- Twelve weeks on half pay or London Living Wage (whichever is greater) plus Statutory Maternity Pay (SMP)
- A further 21 weeks' of SMP
- Thirteen weeks of unpaid leave.

SMP is thus paid for a total of 39 weeks of the 52 week maternity leave period.

Employees who have less than 26 weeks' continuous service with TI-UK at the beginning of the 11th week before the EWC or who earn less than the lower earnings limit for National Insurance Contributions may be entitled to Maternity Allowance.

If an employee makes a flexible working request before going on maternity leave which results in the reduction of their salary, TI-UK will enhance the maternity pay to the new reduced salary, not the salary during the qualifying period. If the employee's salary is reduced due to an organisational change led by TI-UK, TI-UK will enhance the maternity pay to the salary during the qualifying period.

### Right to Return to Work

An employee shall normally return from her maternity leave on the date advised by her before her leave commenced. An employee has the right to return to the job in which she was employed under her original contract of employment and on terms and conditions not less favourable than those which would have been applicable to her if she had not been absent.

Should you wish to return earlier than previously agreed, you are required to notify TI-UK at least eight weeks in advance. It is at TI-UK's discretion to accept a reduced period subject to its business needs. If the employee wishes to extend the time off, she is required to give at least eight weeks advance notice before the expected return date.

A request to return on a part time basis will be viewed sympathetically subject to the requirements of the post and of TI-UK. This will be considered in line with our flexible working policy.

### Adoption Leave

You are entitled to paid adoption leave if you have:

- Been matched with a child by a UK or overseas adoption agency
- Notified the agency that you agree that the child should be placed with you and have agreed the date of placement



- Notified TI-UK that you wish to take statutory adoption leave (SAL) no more than 7 days after you were notified that you have been matched with a child.

If you are eligible for adoption leave you can take up to 52 weeks of leave. This is made up of 26 weeks of ordinary adoption leave and 26 weeks of additional adoption leave. Additional adoption leave must follow immediately after ordinary adoption leave with no intervening gap. Only one person in a couple can take adoption leave, the other person may be able to take paternity leave or shared parental leave. Except for the terms below relating to pay, the terms and conditions of employment which would have applied to you had you been at work continue through the entire adoption leave period unless either TI-UK or you expressly end the contract or it expires.

### Statutory Adoption Pay (SAP)

Subject to qualifying conditions, you will be paid:

- Six weeks on full pay inclusive of any Statutory Adoption Pay (SAP)
- Twelve weeks on half pay or London Living Wage (whichever is greater) plus Statutory Adoption Pay (SAP)
- A further 21 weeks' of SAP
- Thirteen weeks of unpaid leave.

You must give at least 28 days' notice of when you would like SAP to start or as soon as is reasonably practicable.

### Keeping in Touch (KIT) Days

During the adoption leave period TI-UK will maintain reasonable contact with you and it is hoped that you will keep contact with TI-UK.

Up to ten (10) KIT Days can be worked, by mutual agreement, during the adoption leave period without affecting your SAP or adoption leave. These will be agreed, as far as possible, before the commencement of the leave and will be paid at your normal rate of pay.

### Right to Return to Work

If you return during or at the end of the ordinary adoption leave period, you are entitled to return to the same job, on the terms and conditions as if you have not been absent on adoption leave.

If you return to work during or after additional adoption leave you are entitled to return to the same job unless it is not reasonably practicable. In this situation you will be offered a similar job on terms and conditions that are no less favourable than your original job.

Should you wish to return to work before the previously agreed end of your adoption leave, you are required to give TI-UK at least eight weeks' notice of the date that you intend to return to work. It is at TI-UK's discretion to accept a reduced period subject to its business needs. The same applies if you wish to extend your adoption leave.

### Joint and Individual Adoptions

Where a couple are adopting jointly, you can choose (regardless of gender) who will take statutory adoption leave and pay (SAP) and who will take statutory paternity leave and pay (SPL&P). If you are adopting as an individual, only you are eligible for SAP - although your partner (regardless of gender) may be eligible for SPL&P

## Paternity Leave

To qualify for paternity leave and paternity pay for a birth, the following criteria apply:

- You must be the biological father of the child or the mother's husband or partner
- You must have or expect to have responsibility for the child's upbringing
- You have at least 26 weeks' continuous service with TI-UK leading into the 15<sup>th</sup> week before your baby is due
- You continue to be employed by TI-UK until the birth of your child
- You have notified TI-UK at least 28 days before you wish your Statutory Paternity Pay (SPP) to start.

If you satisfy all of the above criteria, you are entitled up to two consecutive weeks of paternity leave. Subject to agreement with your manager, TI-UK may permit the taking of this leave in flexible ways e.g. as single days or separate weeks.

Subject to the qualifying pay criteria, TI-UK will pay an enhanced paternity pay of two weeks at full pay inclusive of statutory paternity pay.

Paternity leave must normally be taken within 56 days of the birth of the child unless otherwise exceptionally agreed with HR.

You are also entitled to take paid time off work to attend two antenatal appointments. This is limited to six and a half hours per appointment.

## For adoption

To qualify for paternity leave and pay for an adoption, you must:

- be the partner of an individual who adopts a child OR be the member of a couple adopting who is not taking adoption leave
- have at least 26 weeks' continuous service with TI-UK leading into the week in which the adopter is notified of being matched with a child and
- continue to be employed by TI-UK up to the date of placement of the child for adoption
- be taking time off to support the adopter and/or to care for the child. You cannot take paternity leave for any other purpose
- have notified TI-UK no more than 7 days after the adopter has notified you that you have been matched with a child.

## Shared Parental Leave

You and your partner (regardless of gender) can apply for Shared Parental Leave (SPL) and Statutory Shared Parental Pay (ShPP) if you are having a baby or adopting a child.

The conditions for those expecting a child are:

- that you have been employed continuously by the same employer for at least 26 weeks by the end of the 15<sup>th</sup> week before the due date
- that you share responsibility for the child at birth
- that you stay with the same employer while you take SPL.

For those adopting a child, the conditions are:

- that you share responsibility for the child
- that you have been employed continuously by the same employer for at least 26 weeks by the end of the week you were matched with the child
- that you stay with the same employer while you take SPL.

You can share up to 50 weeks of leave and up to 37 weeks of pay between you. You need to share the pay and leave in the first year after your child is born or placed with your family.

You can use SPL to take leave in blocks separated by periods of work, or take it all in one go. You can also choose to be off work together or to stagger the leave and pay.

### Shared Parental Pay

TI-UK pays enhanced shared parental pay as follows:

- Six weeks on full pay inclusive of ShPP in addition to two weeks' paternity leave
- Twelve weeks on half pay plus any ShPP.
- A further 19 weeks' ShPP.
- Thirteen weeks of unpaid leave

ShPP is thus payable for 37 weeks of the 50 week SPL period

### Time off for family and dependents

We recognise that there may be times when you need to deal with an emergency or an urgent caring need involving a dependent. A dependent could be a spouse, partner, child, grandchild, parent or someone who depends on you for care.

You are entitled to a reasonable amount of time off to deal with such emergencies. Having discussed the specific circumstances with your line manager or the People team it may be agreed that this leave be combined with TOIL, annual or unpaid leave. In some circumstances where a dependent is seriously ill this leave may also be combined with compassionate leave. It is recognised that in those circumstances the leave required may be difficult to plan and further review as to how time will be taken could be required.

In most cases one or two days will be sufficient to deal with the immediate situation, but it will depend on individual circumstances. Whilst there is no automatic right to be paid, TI-UK will pay employees for this time off.

### Parental Leave

Parental leave is unpaid time off that employees who are parents can take to spend time with their child up until the child's 18th birthday. You are entitled to take up to eighteen weeks of parental leave per child.

In order to qualify for parental leave you need to:

- Be an employee
- Have worked at TI-UK continuously for twelve month or more

You can get more details about parental leave from HR.

## Compassionate Leave

TI-UK recognises that bereavement and emotionally difficult or distressing personal situations may arise which mean that employees need to spend some time away from work. Such cases will be treated in a sensitive and flexible manner in granting leave and offering support. Paid Compassionate Leave will be granted at TI-UK's discretion, where for personal reasons an employee cannot reasonably be expected to attend work and other forms of leave are not appropriate.

The amount of Compassionate Leave granted will depend on the circumstances, e.g. whether the employee is responsible for making funeral arrangements, distances they are required to travel, the amount of annual leave they have remaining etc. However, the following may be used as guidelines:

- Where leave is taken following the death of a close relative/family member, e.g. partner, parent, child, sibling, up to 5 days leave plus the day of the funeral will usually be granted, although additional leave of up to another 3 days may be granted where long-distance international travel is required
- Where the employee is solely responsible for dealing with the estate of the deceased relative, an additional one or two days leave may also be granted to deal with probate matters following the funeral
- Where an employee wishes to attend the funeral of another family member or close friend, it is likely that one day's leave will be granted

Where an extended visit abroad is necessary, employees are likely to be granted a combination of Compassionate Leave, Time off in Lieu (TOIL), Annual Leave and Family & Dependents time off depending on the circumstances. TI-UK will not normally grant more than 10 days of Compassionate Leave in a given leave year.

The above examples should be taken as guidelines only. Each case will be considered individually to ensure fairness and consistency. Previous granting of Compassionate Leave should not be considered as setting a precedent. In all cases, the wishes of the employee regarding confidentiality will be respected.

Where Compassionate Leave is *not* granted, consideration will be given to the granting of annual leave or TOIL, if this is available. Alternatively, Family & Dependents time off may be applicable.

## Parental Bereavement Leave

Parental bereavement leave is used in the tragic event of the death of a child, if they die under the age of 18 or are stillborn after 24 weeks' pregnancy. You have this right to two weeks leave from the day you commence employment with TI-UK.

The criteria for statutory bereavement leave and pay applies to the:

- biological parent
- adoptive parent, if the child was living with them
- person who lived with the child and had responsibility for them, for at least 4 weeks before they died
- 'intended parent' – due to become the legal parent through surrogacy
- partner of the child's parent, if they live with the child and the child's parent in an enduring family relationship

Statutory Parental Bereavement Leave can be taken at any time in the 56 weeks following a child's death and is applicable to each individual bereavement.

An employee is entitled to 2 weeks' Statutory Parental Bereavement Pay where:

- their child dies under the age of 18 or is stillborn after 24 weeks' of pregnancy
- they were employed when their child died
- they'd worked for their employer for at least 26 weeks, on the Saturday before the child's death
- they earn on average at least £120 per week, before tax

While the above is the statutory minimum, TI-UK will pay Parental Bereavement Pay regardless of length of service.

You can choose to take either 1 or 2 weeks' leave. If you choose to take 2 week's leave this can be taken in one go or as two separate weeks. Your leave can start from the first day you let us know if within 8 weeks. You can arrange for someone to give us notice on your behalf if necessary. If you take the leave more than 8 weeks after, we would ask that you give us a week's notice of when you wish to start the leave.

If you are taking another type of parental leave (for example, maternity or paternity leave) at the time of the bereavement, any parental bereavement leave will start after the other period of leave has finished but does not have to be taken immediately after. This applies even if the leave is for another child.

The above leave may be taken in addition to compassionate leave and other types of leave that could apply such as maternity, paternity or adoption leave.

## Miscarriage

Miscarriage can be a frightening, lonely and traumatic experience for both women and men. It is often both physically and emotionally painful, with effects that can last for a very long time. Everyone's needs will be different. For example, some people may feel that they can continue to work as normal, while others may require more support. Everyone will experience their loss differently, and we do not make assumptions about how they feel or how they want to be treated.

A pregnancy loss may occur at work and could take place before the statutory period for informing their employer (15 weeks before the estimated due date). Where assistance is required please alert the most appropriate person in the People team or your line manager etc. Time off during and after a miscarriage, ectopic or molar pregnancy is protected as 'pregnancy-related' leave. For periods of absence longer than 7 days, you will need to obtain a Fitness for Work statement from your doctor or health professional at hospital.

You have a right to keep your miscarriage private if you choose. The People team will ask you what, if anything, you would like other people at work to know.

The return to work may need to take into account ongoing hospital appointments. It might also be difficult for someone who has suffered a miscarriage to work closely with or near to a colleague who is pregnant or has recently given birth and the People team and / or line manager can discuss this and any temporary work adjustments required.

## Serious personal issues

Very occasionally, circumstances may arise which, while they do not strictly fall within the bounds of sickness or injury, disability or other recognised category, may affect an employee's ability to maintain

regular attendance, or require extended absence from work. These circumstances may be of a confidential, sensitive or personal nature, affecting the employee, or a person close to them. The employee will be expected to discuss the issue with their line manager or the People team.

In cases where attendance or performance may be seriously affected, the line manager, in consultation with the People team, will determine what provision may be made, if any, to meet the employee's particular needs.

Consideration will be given to length of service, entitlement to holidays or paid sickness absence, and the specific circumstances of the individual case; appropriate medical certification will be required, and/or professional opinion provided where relevant.

### Time Off in Lieu (TOIL)

TI-UK does not pay overtime. However, TOIL may be provided when actual hours of work are in excess of contracted hours of work, e.g. when the employee is expected to work outside of normal working hours – for example, attending compulsory evening events, travel time or working overseas. It is the line manager's responsibility to ensure that their team do not work overtime or unreasonable hours on a frequent basis. Wherever possible, TOIL should be agreed in advance.

TOIL should not result in changes to normal working arrangements, such as every Friday afternoon becoming a 'TOIL' afternoon, or working through lunch and leaving work early each day. TOIL is not a tool to be used to accumulate additional leave days. Most duties should be carried out during normal working hours.

TOIL will be granted in half-day blocks, on a one-for-one basis with additional hours worked and subject to the approval of the line manager. TOIL must be used within two months of its being accrued or it will be forfeited.

Approval of TOIL must be logged with the manager and not on Cascade at the moment.

### Reservists leave

TI-UK recognises the importance of the training undertaken by Reservists that enables them to develop skills and abilities that are of benefit to their respective Reserve Force, the individual and TI-UK.

Reservists are typically committed to 24-40 days training per year. Training tends to take place 1 evening per week, over various weekends throughout the year and one 2 week training period also known as 'annual camp'. Training commitments vary but in most cases include:

- **Weekly training** - most Reservists train at their local centre for around two-and-a-half hours, one evening a week.
- **Weekend training** - all Reservists are expected to attend a number of training weekends which take place throughout the year.
- **Annual training** - a 2 week annual training course sometimes referred to as 'annual camp'. This may take place at a training establishment, as an attachment to a Regular Unit, a training exercise or a combination of any of these. Training normally takes place within the UK, although each year some Reservists train overseas.

For colleagues who have successfully completed their probationary period, TI-UK will grant additional paid leave of 2 weeks per year to Reservists specifically to enable them to attend their annual camp. Any additional days required in addition to this must be taken as annual leave. All leave is subject to the usual line manager sign off in Iris and should be requested with as much notice as possible.

### Volunteer leave

As a not for profit organisation that benefits from the support of volunteers we are supportive of allowing colleagues time to develop their own interests in volunteering. After 2 years of service, entitlement to 3 working days in each calendar year can be allocated to volunteering activities. Details of the organisation and the type of activity must be shared with your line manager and the People team for approval to ensure that workload and other timing considerations can be managed. The leave is then logged and approved on our HR system. Organisations must be a UK registered charity (or similar recognised organisation). As a non-partisan organisation this leave is not intended to be used for political activities. Annual leave and TOIL apply as options for those who wish to engage in protests etc.

Some examples of volunteering activities might include:

- Trustee role in another charity
- Mentoring
- Taking part in emergency response activities
- Volunteering at events
- Fundraising

### Other Unpaid leave

Any extended unpaid holiday is required to be agreed in advance and approved by the Chief Operating Officer and will be subject to the requirements of TI-UK. Unpaid leave will not be approved if the employee has paid leave remaining.

## Legal Policy and Procedures

Owner:	<b>Chief Operating Officer</b>	Status:	Approved
Last reviewed:	February 2024	Review date:	February 2026
To be read in conjunction with these other policies and procedures:		<ul style="list-style-type: none"><li>• Publications Checklist</li><li>• Social Media Policy</li></ul>	

### Background

TI-UK needs to be able to speak out confidently and forthrightly on a range of issues, some of which will be controversial or will offend those in positions of power. In speaking out, TI-UK may open itself to legal action of various kinds.

The principal risk is of legal suits for libel or slander based on defamation or breach of privacy. Broadly speaking, libellous or defamatory comments have the potential to damage the good reputation of the individual/organisation and cause them serious reputational or financial harm. Irrespective of whether there has been an actual violation, those looking to silence TI-UK might be tempted to bring frivolous litigation, such as a SLAPP suit (Strategic Lawsuits against Public Participation) with the goal of forcing TI-UK to mount an expensive and protracted legal defence.

To prevent such legal actions from occurring and to reduce the chances of them being successful, TI-UK needs to perform legal checks on its communications outputs and ensure that all staff are aware and trained on what they need to do. It is important that as colleagues you are aware of your responsibilities. TI-UK may be required to demonstrate to a court that we have a responsible in-house legal checks procedure, which all are aware of, receive training on and implement prior to publication.

Such cases may arise from:

- Reports and publications
- Blogs, tweets, photos, cartoons and other social media activity
- Press releases and media statements
- Speeches, presentations, briefings, interviews or conversations

The goal of this policy is not to stifle TI-UK's direct style. There are many contexts where negative statements can still legally be published. The legal check procedures help TI-UK ensure that we publish comments that are accurate, evidenced, responsible and fair – and in line with our legal obligations.

Authors should make sure that any facts that could be regarded as tarnishing a third party's reputation have been properly checked, that any robust opinions expressed about third parties are supported by fact, that any claims derived from external sources rather than our own research are marked as such, and that the source is a sufficiently reputable one.

Given the global audience we reach, we must be mindful of other countries laws when conducting our review.

TI-UK has access to a designated Legal Adviser (Equality Law) who can provide advice and guidance to help to decide what is potentially defamatory or libellous, and how to minimise the risks of successful legal challenge. Please note:



- TI-UK does not need to be the origin of a comment; we can be **held liable for a re-tweet or for hosting** content published by an external individual/organisation.
- Individuals can sue for defamation, as can organisations, companies or groups of people. In some jurisdictions, governments can sue TI.
- The subject **does not need to be named** for the comment to be defamatory – their identity may be clear from other factors such as their job title.
- TI-UK is responsible for completing its own legal checks and cannot rely on checks performed by another organisation.
- That a statement was already published by a media outlet is no defence to libel, moreover those outlets may have worded and presented statements differently to TI.
- We cannot wholly rely on legal advice from other organisations, such as the National Crime Agency or publications such as the FT, though that can certainly be relevant and useful.
- TI-UK's reputation as an anti-corruption organisation arguably makes any statements we publish more damaging to the subject's reputation, potentially further raising the stakes in any libel/ defamation claim.

Periodic training on the legal policy and procedures will be co-ordinated by the Head of Media & Communications and delivered with input from the Legal Adviser (Equality Law) where felt to be appropriate. Input from experienced colleagues should be drawn upon to encourage organisational learning and development in this area.

## The Policy

### What needs to be checked

All of the following outputs must have a legal review, unless the Programme Director deems that a legal check is not necessary, as the material is not defamatory.

- Written outputs including publications and reports, press releases, blogs, tweets, photographs, articles, and cartoons
- Positions that will be stated orally such as in speeches and presentations, media interviews, conversations and presentations

### Responsibilities

Programme Directors are accountable for ensuring that legal checks on any material originating in their programmes have been completed by the Legal Adviser (Equality Law), unless they deem the check unnecessary. The default position should be that any potentially defamatory material that could cause substantial harm requires checking by our Legal Adviser. The Publication Risk forward plan overseen by the Research Committee should be shared with the Legal Adviser once per quarter so they are aware of forthcoming publications.

Programme Directors are obliged to follow any legal advice received. Where residual risk remains and has been highlighted in the advice, the Programme Director should share that assessment, together with their guidance with the Chief Executive in order to arrive at a final decision.

Authors and editors of material are responsible for flagging potentially defamatory material to their Programme Directors, and mitigating any risks associated with the content. This includes working with our Legal Adviser (Equality Law) to carry out a robust and thorough right of reply process.

For organisational press releases and social media statements, ensuring that legal checks are made where necessary is the responsibility of the Senior UK Communications Manager (with oversight by the Director of Policy & Programmes for UK and Director of International Engagement for global). Whenever reasonably practicable, advance notice should be given to the Legal Adviser (Equality Law) that a press release will be arriving in order to allow for timely turnaround deadlines.

The Senior UK Managers will act as a backstop and ask the Programme Director to confirm if checks have been completed or they have authorised publication without a legal check, before publishing or disseminating the material. The Director of International Engagement will provide this for the global activities. The Chief Operating Officer can disagree with the Programme Director to request a legal check. An audit trail of any such decisions (right to reply, legal adviser's advice, any additional internal approvals) must be kept so that comments can be corrected if taken and used out of context.

### Email Communications

In order to establish them legally as 'privileged communications', all emails must contain the standard TI-UK disclaimer clause (below) as part of their signature block.

*This e-mail transmission and any attachments accompanying it may contain information that is confidential and legally privileged. It belongs to the sender and is intended only for the addressees named above. If you are not the intended recipient and have received this information in error, please be advised that its use, disclosure, distribution, copying, printing or action taken on the basis of its contents is strictly prohibited. The views and opinions expressed are those of the author and do not necessarily reflect the positions of Transparency International. UK Registered Charity number 1112842*

### Procedures

The Publications Checklist requires that legal advice is sought and received at least two weeks prior to publication of a report. This is to ensure that we have enough time to give a 'right to reply' to, if necessary.

To facilitate legal checks, all drafts of publications sent for scrutiny need to include:

- attachments or hyperlinks for the primary sources used to substantiate statements (even if these sources are not published and just used for the legal check). The page and location of the source should be indicated.
- Legal orders and judgment appeals relied on.

If a named party has commented in response to any allegations made by TI-UK, or the same allegation made by another organisation, we must include a statement to that effect.

## Managing Organisational Change Policy

Owner:	People Team	Status:	Approved
Last reviewed:	August 2023	Review date:	August 2025
To be read in conjunction with these other policies and procedures:		<ul style="list-style-type: none"> <li>• Capability Policy &amp; Procedure</li> <li>• Departure Policy</li> <li>• Equal Opportunities Policy</li> <li>• Recruitment Policy</li> <li>• Remuneration Policy</li> <li>• Grading &amp; Remuneration Implementation Policy Guidelines</li> </ul>	

### Policy statement/ purpose

1. TI UK needs to position itself to be able to adapt to changing circumstances, and from time to time will need to consider changes to its employee structure or skills mix in order to meet its strategic aims and other obligations and priorities. Where the need for structural changes due to financial, organisational, or other factors arise, TI UK is committed to taking reasonable steps to minimise any adverse impact on employees and disruption to our work.
2. TI UK recognises the benefit of timely and meaningful consultation with employees and will provide all information necessary to enable an informed dialogue.
3. This policy aims to address organisational change and conserve and protect employment within TI UK. It reflects TI UK's commitment to manage change effectively, fairly and consistently and provides a framework through planning, consultation, and communication that is in accordance with established good practice and employment legislation, and with full regard to TI UK's Equality and Diversity Policies.

### Management planning

4. TI-UK Management undertake an Annual Planning and Budgeting process that also includes risk assessment. These plans are reviewed and approved by the Board. Throughout the year Quarterly reviews are undertaken to monitor progress in terms of financial and other risks. A fundraising pipeline is maintained to help ensure continuity of revenue to support the delivery of strategic plans. From time to time as new priorities are identified, funding opportunities arise and / or financial challenges require to be addressed the need for organisational changes that impact employee numbers, roles etc. can arise.
5. TI UK is committed to full disclosure of information, including financial information, necessary for consideration of these issues in a timely and comprehensive manner. Timescales for consultation and implementation will vary according to the size and complexity of the change being proposed. Where jobs are at risk, full account needs to be taken of contractual notice periods for employees, and the likely time needed to ensure reasonable time for consultation before final decisions are taken.

6. Where TI UK is proposing organisational change a consultation document will be prepared that depending on the size and complexity of the changes will outline:
- The business case and rationale behind the proposed change
  - The actual proposals for change (including the proposed employee structure and charts)
  - The assessed benefits and risks associated with these proposals
  - The financial implications
  - The people impact of the proposals, including the number of employees, roles and grades affected, the proposed methods of redundancy avoidance such as of job matching, suitable alternative roles, redeployment
  - Where redundancy avoidance is not possible to outline the method of selection of posts that may be placed 'at risk' of redundancy together with details of Equality Analysis in line with the Equality Act 2010
  - Details of the proposed consultation timescale, consultation team members, a schedule of meetings and proposed timescale for implementation of the changes
7. There may be occasions when TI UK needs to implement relatively minor changes to working practices. Examples of minor changes include: changes in reporting line; implementation of different methods of carrying out tasks; introduction of new technology and/or changes in duties within the remit of the post that do not cause changes to grading or substantial changes to the nature of the post. These minor changes to working practices are outside the remit of this policy.

## Consultation

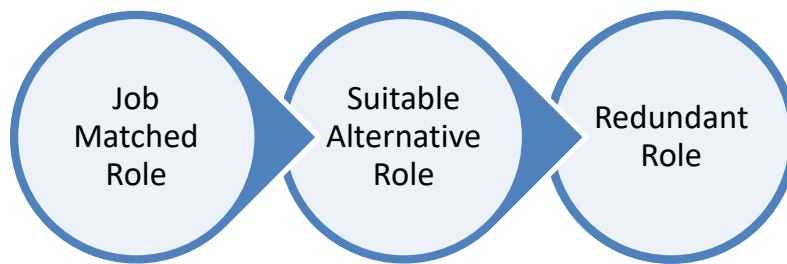
8. We shall ensure meaningful consultation with employees to gather views and comments as a basis for informing decision-making. We shall encourage a genuine exchange of views and jointly consider alternative options, and shall seek solutions which are mutually acceptable, without the necessity to reach agreement on all matters.

## Communications

9. Throughout any process of organisational change and consultation TI UK will ensure that communication with employees is clear, timely, open and two-way. Depending on the scale and complexity of change proposals, communications will be effected through various media, such as regular email communication, and One Team meetings.

## Decision to proceed

10. At the conclusion of the consultation process, (i.e. when all parties agree that all relevant issues have been considered) TI UK will consider all comments and make a decision on the way forward. This decision, with reasons, will be confirmed in writing. Where the proposals for change result in employees being placed at risk of redundancy, TI UK will explore all possible opportunities to conserve employment. In addition reasonable assistance will be given to those impacted, including applicable outplacement support services and reasonable time off to seek other employment, or undertake training.



### Job matching

11. In a restructure in which existing posts cease to exist, job matching (also known as job mapping) will be utilised in the first instance wherever possible. This allows individuals to be job matched to posts within the revised structure without the need to go through a formal selection process. Before a job can be considered as a match it should be shown to have a minimum of a 70% match of elements between the old role and the new role. Where more than one individual could be matched into a role, a competitive process will apply.
12. Information concerning new posts in the proposed structure, including the job description and job evaluation data will be utilised in assessing job matching.

### Ring-fencing

13. At the time of the formal commencement of a consultation process, where employees might be at risk of redundancy following restructure, the vacant post(s) in the new organisational structure will be ring-fenced, meaning that in the first instance, applications will only be accepted from employees 'at risk' of redundancy. Details of the post(s) will be explained and communicated to them and they will be offered the opportunity to apply.
14. The job description and person specification will be provided and individuals will normally have up to 5 working days in which to confirm their interest and submit an application.
15. The normal selection and appointment process will apply and appointment decisions will be made using objective selection criteria.
16. If there is only one employee 'at risk' and one vacancy, they will be offered that post; provided they are an appointable candidate, in accordance with the skills, experience and qualifications shown in the person specification.

### Suitable alternative employment

17. We shall advise any employee at risk redundancy as a result of any re-organisation or restructuring that suitable alternative employment opportunities will be explored as a basis for protecting their continued employment with TI UK. Legislation to prevent discrimination on the basis of pregnancy, maternity, shared parental and adoption leave is in place. This requires employees to actively share details with the People team so that TI-UK can comply

and ensure that the rights of those who are pregnant or a recent returner from parental leave are protected with regards to suitable alternative employment. In the early stages of pregnancy this can be done confidentially to the People team directly.

18. A post that attracts broadly the same terms and conditions of employment or that is not substantially different from an individual's existing post, may be considered to be suitable alternative employment. However, each situation must be considered on a case by case basis taking into account the following factors:
  - Similarity to current role
  - Skills, abilities, circumstances in relation to the job
  - Pay and benefits
  - Terms and conditions
  - Role Status
  - Location, Working environment, Hours of work
19. An offer of a post as suitable alternative employment shall be made in writing and set out the terms and conditions of the new post in sufficient detail to show how it is not substantially different from the employee's existing post.
20. Where an employee accepts suitable alternative employment, a trial period of a minimum of 4 weeks will apply. This is in line with statutory requirements, however, depending on the circumstances and requirements of the post, and following discussions with HR, an extended trial period may be agreed to ensure the employee and TI UK has sufficient time to decide if the new position is suitable without the individual losing the right to entitlement to redundancy pay during this period.
21. Employees need to be aware that should they unreasonably refuse an offer of suitable alternative employment they may lose their right to redundancy pay.

## Redeployment

22. Effective redeployment retains valuable skills and knowledge within the organisation. All employees in the situations outlined below in which redeployment may be appropriate, include:
  - when an existing post is no longer required, the post holder is at risk of redundancy and there is no suitable alternative employment;
  - when part of a post is no longer required.
23. TI UK recognises that redeployment constitutes a change to an individual's contractual terms of employment and will be undertaken in full consultation. The People team shall work with the employee to assess their transferrable skills, including exploring training and developmental opportunities within reasonable cost.

## The redeployment process

24. For employees at risk of redundancy and seeking redeployment, efforts to identify redeployment opportunities will continue during the time the individual remains at risk. Such employees will be granted reasonable time-off to attend job interviews.

25. When a vacancy arises, the People team will send details to all employees at risk that are in the redeployment pool and are at the grade of the vacancy or one grade above or below. They will be given at least 5 working days to express an interest.
26. Employees who express an interest in any vacancy shall be considered against the normal selection criteria.
27. Where an employee is offered a post under the provisions of this redeployment process, a trial period of a minimum of 4 weeks will apply. This is in line with statutory requirements, however, depending on the circumstances and requirements of the post, and following discussions with the People team, an extended trial period may be agreed to ensure the employee and TI UK have sufficient time to decide if the new position is suitable without the individual losing the right to entitlement to redundancy pay during this period.
28. Employees need to be aware that should they unreasonably refuse an offer of redeployment, or unreasonably terminate the contract during the trial period, they may lose their right to redundancy pay.

### Flexible working

29. There may be circumstances in which Flexible Working can be effective in mitigating the effects of potential redundancy. Any changes to working patterns shall be voluntary in nature and by agreement with the employee concerned. Reference should be made to TI UK's Flexible Working policy.
31. It should be noted that flexible working arrangements pertaining to a role that is at risk of redundancy will not necessarily transfer to a new role as such arrangements are role specific and subject to change.

### Gardening Leave

32. There may be circumstances in which we would place an employee on 'gardening leave' as a redundancy avoidance measure where there is a strong likelihood of offering them an alternative role within no more than a three month period. During such leave the employee shall be available to undertake any reasonable assignments.

### Redundancy process

33. The redundancy process will apply when all redundancy avoidance measures as outlined above have been exhausted. Where redundancy is unavoidable, it will be handled in the most consistent and sympathetic manner. Consultation with employees will continue throughout the process. HR will be involved at all stages in order to provide a consistent approach and ensure compliance with statutory redundancy requirements.

### Consultation and Provision of information regarding potential redundancies

34. In order to facilitate meaningful consultation TI UK will provide the following information to employees:
  - the reason(s) for the proposed redundancies;

- the number and descriptions of posts it proposes to make redundant;
  - the proposed method and time period of selecting those who may be impacted
  - the method of calculating the amount of redundancy payments
  - an Equality Analysis
35. For employees who are not able to attend the workplace – such as those on maternity leave, long-term sick leave or a career break, TI UK will ensure that they are included in the consultation, using an agreed means of communication such as telephone, letters and individual consultation meetings.
35. Employees at risk of redundancy will be invited to a meeting with the relevant manager (Programme Director) and the People team. Should they wish to be accompanied at these meetings by another colleague this is possible and the People team should be notified of this in advance. At the meeting, the parties will discuss the reasons for the potential redundancy of the post and the individual will be given the opportunity to respond to the proposals and the selection criteria and make any alternative proposal which encompasses consideration of the selection criteria. The individual's views will be considered by management. Subsequent meetings will be arranged as necessary, depending on the individual case. As soon as possible after this, a final decision will be made in writing with confirmation of the leaving date, eligibility for redundancy pay and the right to appeal.

### Selection for Redundancy

36. In some redundancy situations, it may be necessary to identify a pool of employees at risk of redundancy. The pool must be objective, transparent and non-discriminatory. Once the pool of 'at risk' employees has been identified, the criteria for selection for redundancy from the pool may include some or all of the following:
- the skills, knowledge, qualifications and experience required to meet the present and anticipated needs of TI UK;
  - performance, conduct and attendance (excluding maternity, paternity, adoption, shared parental leave and long-term leave).
37. The criteria for selection will be made available to all those identified as being in the pool of employees 'at risk' of redundancy.

### Notification of redundancy meeting

38. Employees selected for redundancy will be invited to a redundancy termination meeting at which the basis for this selection will be explained. The employee will receive a calculation of estimated redundancy benefits, and may raise questions about the criteria for selection and their projected redundancy payment. Employees will have the right to be accompanied at that meeting by TI UK work colleague or a trade union representative / official. HR will be present at these termination meetings.
39. Following the notification of redundancy meeting, an employee whose employment is terminated on the grounds of redundancy will receive formal notice in writing with confirmation of the leaving date, eligibility for redundancy pay and the right to appeal.

### Appeals against redundancy



40. Employees notified of termination on grounds of redundancy shall be advised of their right to appeal against the decision. Appeals must be submitted to the Chief Operating Officer (COO) within five working days of receipt of final notice of redundancy. The COO will send the employee a letter acknowledging receipt of the appeal and a follow-up letter containing details of the date, time, place and other particulars about the appeal hearing. In most cases, a panel to hear the appeal will be convened within 10 days of receipt of the appeal letter. The panel will normally consist of the COO, and one other member of the SLT. The Programme Director may be invited to attend to answer questions. The employee has a right to be accompanied to the hearing by a TI UK work colleague or trade union representative / official. A People team representative will be in attendance.
41. Appeals will be based against the selection of an individual for redundancy, not against the decision to restructure. The terms of reference for the appeal would be to review whether the selection for redundancy was adequately substantiated or to review whether the procedures were correctly and fairly implemented.
42. The decision of the appeal panel will be final and will be communicated in writing.

### Redundancy Payments

43. TI UK will make redundancy payments to individuals who have at least two years' continuous service. Statutory redundancy payments as currently outlined in the Employment Rights Act 1996 indicate:

<b>Service</b>	<b>Payment for each year of completed and continuous service</b>
For each complete year of service up to age 22	Half a week's pay
For each year of service at age 22 but under age 41	One week's pay
For each year of service at age 41 or over	One and a half weeks' pay

TI UK will seek to provide enhanced terms where this is affordable with the payments set at each distinct redundancy process.

### Monitoring

44. A record of all consultations regarding a restructure will be maintained by the People team. This will include details of the consultation process, the outcome and relevant diversity monitoring data.

## Managing Performance Policy and Procedures

Owner:	<b>People Team</b>	Status:	Approved
Last reviewed:	October 2024	Review date:	October 2026
To be read in conjunction with these other policies and procedures:		<ul style="list-style-type: none"> <li>• Capability Policy &amp; Procedure</li> <li>• Grievance and Disciplinary Procedures</li> </ul>	

### Purpose and Scope

1. TI-UK's approach to managing performance is that it is everyone's responsibility, and we all have a part to play to ensure optimum performance in all our endeavours. Managing performance is more than an annual appraisal. It is about everything we do to ensure everyone is positioned to achieve well in their role. We want you to be the best you can be.
2. This document sets out our managing performance system and outlines the policy and procedures that support it. It is aimed at ensuring that we recognise and celebrate great performance, that all colleagues are clear about what is expected of them in their role, and how everyone can contribute to our mission of fighting corruption worldwide.

### Preliminary steps

#### Job profiles

3. **Job profiles** tell colleagues what is expected of them in their position and how their role relates to others in their team and across the organisation. When designing job profiles consideration must be given to:
  - the immediate, medium, and long term purpose of the role
  - fit within programme's/organisation's strategic objectives
  - co-relation with other roles in the immediate team/wider organisation and potential negative impact on interpersonal dynamics
  - a clear person specification that includes attitude/behaviour/values/
  - allowing room for growth and development within the role
  - feedback on the role from previous postholder before new recruitment takes place. This feedback should form part of their handover notes.
4. Job profiles **must** always be about the role and the business (strategic delivery / operational support) need. They **must** not be built around an individual or their skills and interests. Clear job profiles define expectations and responsibilities and reduce conflict and ultimately supports good performance.

*[Link to job profile template.](#)*

### Selection/Appointment Process

5. Our **selection and appointment** process are aimed at ensuring we appoint the best candidates with a wide range of skills and experience to perform the role in the immediate, medium and long term. However, where potential for growth in the role is recognised, this would be captured in a development plan.

### Induction

6. A thorough **induction** helps a new colleague settle in quickly and gain a practical understanding of their role and associated relationships in their team, programme and across

the organisation. It is the line manager's responsibility to ensure that a thorough induction plan is in place ahead of the colleague's start date and this is shared with them as part of their introduction meeting with their line manager on their first day. The colleague has a responsibility to engage with the process and proactively carry out any tasks assigned to them.  
[Link to induction checklist](#)

## Probation

7. Objectives must be set for the **probation period** as soon as possible as per the induction checklist. For the duration of the probation period a monthly one to one meeting must take place using the 'Probation one to one' form. These meetings will cover reviewing progress on objectives, wellbeing check, how the colleague is finding blended working, any other issues that either party wish to discuss. The final meeting will be at the end of the probation period and for this the 'Probation Review' form will be used.

[Link to 'Probation one to one' form](#)

[Link to 'Probation Review' form](#)

## Performance Review Meetings

8. **All colleagues will have at least three one to one meetings per year (check-in's), in addition to an annual review**, ensuring that everyone has in total four meetings a year with their line manager. This is to ensure that we have a standardised approach to reflective dialogue that help to build and maintain healthy working relationships, where all colleagues are supported and are aware of what is in place to support their performance and development.
9. The performance meetings do not replace regular operational/task-oriented update meetings, these are necessary and should continue to take place on a regular basis.
10. These meetings are not a tick box exercise, they are meant to provide opportunity for meaningful conversations in a structured way. The process is designed to promote continuous improvement of performance in a positive and supportive way that enables colleague development and recognises contribution and success.
11. The meetings are also an opportunity for colleagues to convey to their manager their thoughts and feelings about their role and job content and communicate any difficulties they may be facing in fulfilling the role and suggest any solutions/ideas they wish their manager to consider.
12. The meetings also provide guidance and support from managers on how to achieve the objectives. They are an opportunity to recognise and celebrate success, identify future potential, and communicate feedback and assessment on performance.
13. It is the manager's responsibility to book the meetings far enough in advance so that there is time for both parties to prepare and ensure the necessary time is protected. All colleagues must take part and engage productively in these reviews.
14. At the annual review, managers in collaboration will set objectives relevant for the role, which reflect the annual plan and programme/team delivery of outcomes for the forthcoming year. These objectives will then be considered at each check-in meeting and at the next annual review.

## Quarterly Check-In meetings

15. **Check-in meetings** are about reviewing progress, celebrating success, identifying needs, checking on wellbeing and offering appropriate support. Every colleague must have at least

one of these meeting per quarter, however, they can also be held more frequently if the manager decides there is the need.

16. In addition to booking the meeting far enough in advance, it is also the manager's responsibility to ensure the form is fully filled in and record that the meeting has taken place on Iris.
17. For the meetings to be productive it is important that both manager and colleague prepare and review notes from the previous one ahead of the meeting.

### The Check-In form

18. The key aspects covered in the check-in meeting and outlined in the form include:

#### **What am I celebrating?**

- This section is for you to record what you are pleased about and what you have learned since the last meeting.
- Under the section titled 'Appreciation I've received' record positive feedback/ /appreciation that you have received from other colleagues /Chapters/Movement/external contacts.
- Under a section titled 'Appreciation I've given' record positive feedback/appreciation that you have given to other colleagues /Chapters/Movement/external contacts?

#### **How am I feeling at work?**

- This section focusses on how you are feeling about your job and your working environment and suggest any solutions/ideas you wish your manager to consider.

#### **Things I've learnt since my last meeting**

- This section is about recording what has been learned since the last meeting. These can be big or small things. Learning is not always about attending courses, webinars etc. we also learn a great deal from the 'why' and 'how' we do things, from conversations with colleagues etc. Consider how you can do a better job by learning from what has gone well or what hasn't gone so well.

#### **What I want to do next**

- This section looks forward to the next meeting. You can record things that might need to be improved and future plans, which could include such things as training opportunities.
- There is also a section on "how can we support you to take these forward".

#### **How can I be better supported in relation to living out our values?**

- This section is about how we can improve our practice and approach to living out our values for you and for all our colleagues. It also provides you opportunity to say how you are feeling and to inform your manager of any support you may need.

#### **Update checklist**

- This checklist is a helpful reminder of things that are important for all colleagues and all areas should be covered and recorded.

#### **Objectives**

- This final section is where the SMART objectives that are being worked towards are listed and the progress which is being made towards these objectives can be recorded. SMART stands for specific, measurable, achievable, realistic and time scaled. The colour coding system used to record annual plan progress is utilised so as to record progress to date and whether the objective will be met in full by the end of the assessment period.

### Annual Performance Review Meeting

19. The annual review and objectives setting takes place in April and is followed by a quarterly one to one meeting. The purpose of the review is to reflect on the last working period before the annual review and also a general reflection on the 12 month period, and to set future objectives for the year ahead.
20. The form for the annual review meeting is the same as for the check-in meeting and should be completed in the same way as described above, other than the final section. This section records reflections on what has gone well over the 12 month period and the areas that could be better or improved. There is also a place for the manager and the colleague to sign the form.
21. It is the line manager's responsibility to plan and book the annual review meeting far enough in advance, and ensure it happens, and is recorded.
22. The discussion will take account of the contribution and involvement throughout the 12 months review period. This will be based on the previous check-in meetings. The review will consider the progress that has been made against the agreed objectives recorded.
23. Following the discussions, the manager will agree with the colleague the longer-term objectives for the year ahead. Colleague's comments and opinions are noted but it is the responsibility of the manager to make an overall judgement of performance based upon the review meeting discussions for the previous 12 months.

### Performance falling below expectations

24. Where this occurs, the manager has the Performance and Capability procedure or Disciplinary procedure to assist in improving performance to the required standard. Actions will be agreed to get you back on track including any training that is required.
25. Any performance or conduct that falls short of TI-UK's expectations should be dealt with at the time that the issues arise.

### Summary of Review Timings

26. Review meeting timings are aligned to the organisational reporting cycle:

	Activities to:	Review Meetings
Quarter 1	June	Mid-July / 1 <sup>st</sup> week August
Quarter 2	September	Mid-October/ 1 <sup>st</sup> week November
Quarter 3	December	Mid-January / 1 <sup>st</sup> week February
Full year	March	Mid-April / Mid-May

## Private Sector Engagement Policy

Owner:	Chief Executive	Status:	Approved
Last reviewed:	March 2023	Review date:	March 2025
To be read in conjunction with these other policies and procedures:		<ul style="list-style-type: none"><li>• Anti-Bribery Programme</li><li>• Business Integrity Terms &amp; Conditions</li></ul>	

### 1. Introduction

The purpose of this policy is to outline the approach that Transparency International UK (TI-UK) takes with respect to our engagement with the private sector. It recognises that the engagement spans a range of diverse outcomes. These include working alongside the private sector in both commercial and non-commercial approaches to tackle private sector corruption. Promoting learning, benchmarking and engagement across the sector; as well as ways in which specific organisations may wish to directly support the work of TI-UK, including sponsorship and participation in tools and learning.

TI-UK has over 25 years maintained independence, raised the bar of business integrity and anti-corruption standards whilst also raising the funds to progress that work. The policy outlines the reputational risks that such engagement can expose TI-UK to, along with how we mitigate these risks upfront. This includes what we look for from those we engage with in the private sector and how we would respond to instances where the reality differs.

### 2. Principles

The following principles guide Transparency International UK's approach to private sector engagement:

#### *Integrity*

1. TI-UK recognises the importance of the commitment to ethical behaviour, integrity and responsibility in all its activities.

#### *Legitimacy*

2. TI-UK's engagement with the private sector must meet legitimate anti-bribery and corruption objectives, serve the interests of the anti-corruption mission and comply with laws.

#### *Openness*

3. TI-UK strongly encourages a culture of openness in which bribery and corruption risks are discussed, in order to respond better both to immediate circumstances and in the longer-term.

#### *Transparency*

4. TI-UK is fully transparent about both its approach to anti-bribery and all relevant information such as entries to the gifts and hospitality registers and sources of its funding.

#### *Consistency*

5. TI-UK will act in a manner consistent with its values, guiding principles, policies and procedures and will maintain consistency in its approach to private sector engagement.

### 3. Commitments

TI-UK ensures that the above principles are adhered to in its private sector engagement. In its private sector engagement partners, it expects to see evidence of commitments to and on-going work in relation to:

#### *Risk Assessments*

6. Corruption risk assessment as an integral part of the organisation's overall and on-going risk management process.

#### *Devise and Implement Robust Anti-Bribery and Corruption Procedures*

7. Implementing and maintaining robust procedures which are proportionate to the risks and to the size, resources and complexity of the organisation.

#### *Due-diligence Assessment of Partners, Agents and Contractors*

8. Assessing the bribery and corruption risk associated with entering into partnership or contracting arrangements with other entities and then carries out periodic due diligence based on that risk assessment. Partnership or contractual arrangements are checked to ensure that these organisations have policies and procedures that are consistent with TI-UK's own procedures. More information on our due diligence process for our Business Integrity programme and fundraising engagements can be found [here](#).

#### *Dissemination and Communication*

9. Having established effective internal and external communication of its policy and procedures. The organisation undertakes training and awareness programmes to ensure employees, agents and partners are aware of the potential risks, how bribery might affect them, what they should do if they are offered a bribe, and the consequences should they be found to have made or received a bribe.

#### *Monitoring and Evaluation*

10. Using the TI-UK Corporate Anti-Corruption Benchmark or similar benchmarking process as a critical tool to monitor the implementation of internal anti-bribery and corruption programmes and approaches as part of overall risk management and internal control processes. Periodic reviews of anti-bribery and corruption approaches are made and reported as part of governance and accountability processes.

### 3. Transparency International UK's Private Sector Engagement Policy

TI-UK engages with the private sector in the most effective way to tackle corruption where it exists. We help tackle private sector corruption and improve corporate transparency and business integrity, to learn from practitioners who deal with corruption on a day-to-day basis and, where impactful, to add the private sector voice to our activities and advocacy to other stakeholders. We also hold the private sector, and the systems that regulate or incentivise private sector corruption, to account.

We undertake independent research on the corruption risks in the private sector, we provide practical guidance for the private sector and engage those companies who are committed to fighting corruption and raising business integrity standards through our Business Integrity Forum and further funded engagement. Where companies are accused of corrupt behaviour or are under investigation for corruption we will not shy away from making public statements or from engaging the senior levels of the company in dialogue in public and bilateral meetings.

This has been the TI-UK approach to the private sector for the last 25 years and we are proud of the independence we maintain and the movement we have seen in terms of raising the bar of business integrity and anti-corruption standards.

TI-UK accepts funding from the private sector. This is in line with the wider Transparency International (TI) movement policy to accept funding from any donor and whether monetary or in kind, provided that acceptance does not impair TI's independence to pursue its mission or endanger its integrity and reputation (see **Annex 1**). In this vein, TI-UK also participates in consortia with private sector



companies via commercial contracts to deliver anti-corruption projects funded by third parties (typically Government Overseas Development Assistance funding).

#### 4. Private sector engagement risks

TI-UK recognises that there are risks associated with private sector engagement. These risks can vary by company size, type of engagement and wider considerations within all programmes including Global Thematic Networks (GTNs)<sup>1</sup>, and without suitable mitigations, could lead to serious and material reputational and financial repercussions for TI-UK. As such, we have conducted a risk assessment across TI-UK including the Defence and Security Programme and Global Health. The primary risks identified include:

- Being seen by stakeholders (such as funders, allies, civil society, employees, potential employees, the media, the public etc.) to be influenced by corporate funders (perceived loss of integrity and independence);
- Companies exonerating themselves and avoiding harm to their brand through superficial/seemingly limited engagement with us; or
- Losing, or being barred from, institutional or other donor funding due to engagement with certain industries/companies.

#### 5. The range of approaches available that we utilise to manage private sector engagement risks

TI-UK monitors these risks and approaches across programme teams seeking to ensure a consistent approach and to avoid opposing or contradictory strategies that undermine our mission.

TI-UK has a Private Sector Engagement Committee (a sub-committee of its Board) to govern TI-UK private sector engagements, which ensures that there is a strong level of understanding and comfort with our private sector engagement across Transparency International UK in our UK Programme, the fundraising and engagement team and the Defence and Security Programme and the Global Health Programme. Each engagement case is considered on its merits and a full consultation is undertaken to understand the potential impact on individual programmes reputation and integrity. TI-UK also recognises that there is much to learn from engaging with organisations who operate in high risk locations and are adapting to new ways of working and that tailored approaches can help develop our evidence and research base.

Standardised publically available Terms & Conditions for funded engagements are in place for standard engagements. (Benchmarking, Business Integrity Forum membership, sponsorship for research and publication, pro-bono support etc.). For commercial contracting in consortia for ODA funded work, TI-UK conducts its own due diligence and monitoring, and also utilises ODA funder screening questionnaire due diligence inputs to provide information to assess risks.

TI-UK utilises as standard industry standard Due Diligence software to carry out open-web and database research to monitor and review private sector stakeholders. The Private Sector Engagement Committee governance process includes a company due diligence assessment template and interview

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<sup>1</sup> Transparency International has a number of sector specific GTN's within the movement, two of which are hosted by Transparency International UK.



question set for conversations with senior management of a company to assess suitability for engagement whether funded or in other ways considered potentially high risk. For ODA-Contracting companies, the information gathered from the Government screening process is incorporated as a source of information and this is supplemented with further online searches to garner company culture, commitment to integrity etc.

The Evidence and Engagement team and programme teams maintain relationships with existing and potential funders/donors to understand if and how engagements with particular private sector industries or organisations could negatively impact TI-UK's fundraising ability. Where donors prohibit the receipt of funding from specific industries e.g. WHO do not allow funding from the tobacco industry these will be considered. The complexity of assessing fast moving industry changes and organisations that operate across different sectors with diverse risks is recognised. The Senior Leadership Team and Board are regularly briefed and provide oversight of funding prospects with suitable delegation of authority levels in place.

Through the publishing of the TI-UK Private Sector Engagement Policy the organisation's stance on private sector engagement, risk mitigation strategies and methods to ensure the maintenance of independence aims to ensure that all partners and stakeholders are aware of our approach.

## 6. Reputational risk

### TI-UK's Definition of Reputational Risk:

"the potential for negative publicity, public perception or uncontrollable events to have an adverse impact on TI-UK's reputation, thereby affecting its research and / or advocacy standing".

### How we manage reputational risk

In defining reputation risk, TI-UK acknowledges that the risk is largely unpredictable and by its nature is more difficult to control and therefore manage.

Types of reputational risks that arise when engaging with the private sector arise from: CEO/ company leadership and employees; adverse events including lawsuits, scandals, regulatory penalties, mergers, acquisitions, workplace practices, data retention failures, products including recalls, services, pricing and clients; and social media controversies / backlashes.

In considering the impact to the reputation to TI-UK we take into account the negative consequences arising to our research, advocacy, sector leadership, as well as our workplace and ability to finance the organisation. In managing incidents and issues, TI-UK will consider the response and seek to have an open dialogue with representatives from the private sector partner to provide them with feedback on the possible damage to TI-UK reputation. Wherever possible this will occur in advance of public statements.

## 7. Application

This policy applies to all programme areas and teams within TI-UK. It aims to ensure a consistent approach is undertaken. The programme areas include the Global Thematic Networks. Whilst a GTN has a level of autonomy from their host chapter in conducting global policy activities and advocacy, public sector engagement and the remit of this policy are aspects that relate to the operation of TI-UK as a host chapter.

## 8. Review

This policy is reviewed by the Senior Leadership Team every two years and approved by the Board. The Private Sector Engagement Committee provide governance oversight on a day-to-day basis for issues arising.

## Annex 1: Policies of Transparency International Secretariat (TI-S) and Transparency International UK on Receipt of Donations

TI-S policy – to which TI-UK subscribes – is as follows:

### Introduction

Donations and other income enable TI to fight corruption. TI needs to secure the funding necessary to undertake its vital work. Secure and diverse funding enables TI to maintain its independence, protect its reputation and operate effectively. We will not accept funds that might harm the reputation of the organisation or impair its independence to pursue its mission.

### Background

The National Chapters and the Secretariat of TI (TI-S) are funded from diverse sources: foundations, governments, the private sector, individuals, membership fees, income from publications, events and other activities and from an endowment fund. Relying on many sources of income helps TI to maintain its independence. Funding may be unrestricted or tied to specific projects.

Generally, the National Chapters and TI-S ('TI Bodies') each raise their own funding. As regards fundraising for the Secretariat, the Donor Relations department leads and coordinates fundraising activities at TI-S. A sub-committee of the TI Board, the Fundraising Task Force, pursues and oversees major fundraising initiatives for the movement. This committee also advises on all matters referred to it under the procedure described below. TI must not risk jeopardising its reputation for honesty, openness and integrity. Its reputation could be compromised if a TI body received funding from sources that were perceived to be pursuing activities inconsistent with TI's mission.

### Policy

It is TI's policy to accept funding from any donor and whether monetary or in kind, provided that acceptance does not:

- impair TI's independence to pursue its mission
- endanger its integrity and reputation

### Scope

This Policy applies to all fundraising for all TI bodies, regardless of types of donor or amounts involved, unless otherwise stated in this document. It is to be applied to all new funding from existing donors and to all new donors in the future. It does not apply to income raised from the sale of publications or from fees for participation in conferences, events and other activities. Appropriate care to protect the reputation of TI should always be taken.

### Guidelines

Funding to enable TI bodies to carry out their work should be sought from a wide range of sources. Care should be taken to ensure that project-related funding does not result in undue influence over TI's programme work. Subject to maintaining TI's independence and reputation, TI bodies may accept funding from all kinds of sources. Each TI body should list all donations over €1,000 and publicly disclose them, including in the Chapter's Annual Report and on its website, and likewise in the case of TI-S. If there is a significant risk that receiving funds from a particular source would impair TI's independence or if there is a significant risk to TI's reputation from public association with the donor, then funding from that source must not be accepted by a TI body. Any donation to a TI body must be able to stand up to public scrutiny. TI's independence requires that a donor may be subject to the same criticism by TI as any other organisation or individual in a comparable situation. A donor accused of having been involved in corruption can expect no protection from TI.

TI can receive funding from corporations and donors from the private sector. This does not imply any endorsement of a donating company's policies or record. It is advisable that a potential donating company has made a public commitment to ethical standards (such as the UN Global Compact, the Business Principles etc.), and TI bodies may request that corporate donors sign a commitment to integrity before any donation from that company is accepted<sup>2</sup>. No TI body should accept a donation from a company that is found to have engaged in corruption unless the company can demonstrate that this was a violation of the company's policies, that breach of these policies are being addressed in an appropriate manner, or that its policies have been amended to proscribe a similar violation in future. TI works with companies on the understanding that they are working towards a business environment in which bribery is not accepted.

### Procedure

It is the responsibility of the staff and Boards of Directors of TI bodies to ensure that TI's independence and reputation are not jeopardised. The procedure below describes the steps which should be followed when a staff or Board member believes that any TI body has accepted, or is considering accepting, funding from an inappropriate source. Other people associated with TI may also make use of this procedure.

- If any staff or Board member of a TI body is concerned that there is a threat to TI's independence or reputation from donations already received, or about to be accepted, the person(s) should draw this to the attention of their manager or the Chair of the Board of that particular TI body.
- If necessary, the manager or Chair of the body will consult with the Fundraising Task Force of the TI Board to seek advice on whether to accept funding from a specific donor.
- If any TI body proposes to accept more than €100,000 (or an amount greater than 20% of its overall budget) from any private company in a year, this should be brought to the attention of the TI Board Fundraising Task Force for their advice.
- All communications with the Fundraising Task Force of the TI Board should be made through a TI Board member or the Chief Executive of TI-S. The Fundraising Task Force will report to the TI Board all guidance given under this procedure.

(Passed by the Transparency International Annual Membership Meeting, 10 October 2004)

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<sup>2</sup> *TI-UK allow paid participation in their annual Benchmark survey an industry leading comprehensive self-assessment tool that measures and compares the performance of anti-corruption programmes across private sector companies. Where benchmark participants apply to become BIF members and provide donations to TI-UK full due diligence is performed*

### TI-UK Policy on anonymous donations

The TI-UK specific policy on anonymous donations is as follows:

- Where the anonymous donation is £1,000<sup>3</sup> or below it is accepted with no follow up.
- For anonymous donations above £1,000 and below £5,000 TI-UK will require the name and address of the donor in order to establish that donations are from bona fide sources but will keep that name confidential. If such donations come from sources about which we are uncomfortable (e.g. offshore trust accounts etc.) further enquiries will be made. If an anonymous donation is received through the Charities Aid Foundation, no additional verification work needs to be carried out.
- Anonymous donations of £5,000 and above will require full due diligence.

TI-UK recognises that in practice some donors wish to remain anonymous. In such cases, TI-UK should provide the necessary assurance that the donor's details will only be used to issue a receipt.

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<sup>3</sup> This section was approved by the TI-UK Board on 28<sup>th</sup> April 2010 with specific limits of £500 and £5,000. These sums have been adjusted without any further changes.

## Procurement Policy

Owner:	<b>Chief Operating Officer</b>	Status:	Approved
Last reviewed:	August 2023	Review date:	August 2025
To be read in conjunction with these other policies and procedures:		<ul style="list-style-type: none"> <li>• Travel and Expenses Policy</li> <li>• Conflict of Interest (annexed to Anti-Bribery Policy)</li> </ul>	

### Purpose of the document

The purpose of the Procurement Policy is to set out the principles, policies and procedures on which procurement of goods and services within TI-UK will be based. Services in this policy includes consultancies, editorial services, IT support etc.

Compliance is essential in order to meet our values of integrity and transparency, achieve value for money and meet our obligations to donors. TI-UK aspires to implement good practice, operate fairly and transparently and procure ethically, taking into account environmental concerns, risk to employees and TI-UK as a whole.

This policy will apply to all purchases, irrespective of the source of funds or who is authorised to approve on behalf of TI-UK. It will assist staff to determine the appropriate course of action in buying or commissioning goods and services.

### The Policy

The overall process of procurement for goods and services is set out below although not all of these steps are needed in every case.

1. Identify and specify the product or service required.
2. Seek approval from the budget holder for the intention to purchase (which may be verbal).
3. Request quotations or tenders as per the section below.
4. Select a supplier taking into account specification, cost and availability.
5. Seek the appropriate formal authorisation for the purchase (see below).
6. Draft up a suitable contract if required and proceed to purchase.
7. Keep records and documentation of all the above processes.

### Quotations and tenders

TI-UK sets internal rules for the procurement process based on the total value of the goods or service to be procured. Donor compliance on accountable grants may require stricter limits and these must be followed where applicable.

TI-UK recognises:

- Preferred suppliers for some lower value purchases such as office stationery and air fares.
- Lists of approved suppliers who may be asked to quote when an open tender is not required (see also below under consultants)

In the absence of donor or other rules:

- The purchase of goods or services under £1,000 may be done using a preferred supplier

- A single quote is required for goods or services between £1,000 and £10,000 in value (or under £1,000 if there is no preferred supplier). For single quoted, staff are expected to make a comparison to market rates to assess value for money
- The purchase of goods or services of value between £10,000 and £50,000 requires a minimum of three quotations which may be from a list of approved suppliers
- The purchase of goods or services of value over £50,000 requires an open tender process with a minimum of three suppliers responding (unless there are specific reasons why a smaller number are in a position to tender)

### Value for Money

Value for money does not dictate that TI-UK accepts the cheapest quote or tender. Valid reasons for not doing so include but are not limited to:

- The quality of goods or services being offered
- The ability of the supplier to deliver on time
- The track record of the supplier
- The alignment of the supplier to TI-UK's values and objectives

The process of selection between competing quotes or tenders should be documented and that document will form part of the approval process. Any reasons for not accepting the cheapest quote or tender should be clearly spelt out.

### Approval

Once the above process has been complete, approval to proceed with the purchase is at the following levels (which are dictated by the Delegations of Authority approved by the Board):

Value (£)	Approver	Notes
0 – 10,000	Budget holder	Budget must be approved and funds available
10,000 – 50,000	Programme Director	Formal contract with the provider required
50,001 – 250,000	Chief Executive	Formal contract with the provider required CE may delegate to Chief Operating Officer
Over 250,000	Finance, Audit and Risk Committee of the Board	Contract required

### Contracting consultants

Consultancy services are expected to go through the same procurement procedures as other expenditures with the same financial limits. A full Terms of Reference for the consultancy should be used as the basis for procurement.

From time to time, TI-UK may hold a roster of recognised consultants which will constitute an approved supplier list. However, to ensure the best pool of applicants, staff should consider advertising consultancies by open tender, which would normally be via the TI-UK website.

### Travel

The TI-UK Travel Policy spells out the acceptable modes and costs of travel. From time to time, TI-UK may nominate a preferred supplier for travel (principally air fares). Employees will be expected to use that supplier. Any exceptions should be highlighted to line management.

### Preferred Suppliers

If an employee believes that a preferred supplier is not consistently providing value for money, they should raise this with line management or the finance department. Preferred suppliers will be regularly reviewed, normally on a three year cycle.

### Suppliers Ethical Commitments

TI-UK require within their tender process potential suppliers to confirm that they have read the TI policies and will up-hold them in relation to:

- i. Anti-Bribery and Corruption
- ii. Anti-Fraud
- iii. Anti-Forced Labour and Human Trafficking
- iv. Safeguarding.

These aspects are also incorporated into contractual terms and conditions.

### Documentation

It is essential that all relevant documents associated with a procurement are kept on file. Auditors and/or donors may need to see evidence that due process has been followed. Required documents include:

- The specification of goods or terms of reference for the service to be provided
- Requests for quotes, advertisements or tender notices
- All quotes and tenders received
- A document recording the decision as to which supplier to use and the reasons why
- The formal order or contract for the goods or services
- All invoices, delivery notes and relevant documents (including boarding passes for flights)
- Records of payments made.

### Conflict of Interest

Procurement of goods or services from companies or individuals related to or connected to TI-UK employees or Board members may constitute a conflict of interest. TI-UK's policy on this issue is contained in Annex 3 to the Anti-Bribery Policy.

Any employee concerned about a possible conflict of interest should escalate their concerns to senior management.

### Environmental impact

TI-UK will procure sustainably sourced products whenever possible but without compromising competition and within budget constraints.



## Recruitment Policy

Owner:	<b>People Team</b>	Status:	Approved
Last reviewed:	June 2021	Review date:	June 2023
To be read in conjunction with these other policies and procedures:		<ul style="list-style-type: none"> <li>• Equal Opportunity Policy</li> <li>• Standard Terms and Conditions</li> </ul>	

### Purpose of the document

The Recruitment Policy of TI-UK is determined by the charity's objectives and strategic approaches. It has to serve the objectives of the organisation, which requires an appropriately skilled and highly motivated employees. Basic approaches are:

- Employees recruited by TI-UK should share and support the vision, mission and values of the movement and the general principles of TI-UK. Each employee has to recognise the particular responsibility of their job to the whole movement and is expected to be committed to the fight against corruption and the success of TI-UK's work.
- The resourcing of TI-UK should provide the necessary flexibility to react to opportunities, which have potential to promote TI-UK's goals. Any decision on staffing is based on available funding.

### The Policy

The following basic principles are to be applied to all recruitments:

- Appointments to all positions are made on merit and after due consideration of applications received and the results of interviews held.
- TI-UK strives for balanced and diverse representation, reflecting the diversity of the movement we serve. TI-UK is an equal opportunity employer.
- Family members, and friends and organisations with which we or our families or friends are associated, will not be accorded preferential treatment.
- TI-UK will not hire or contract members of immediate family or close friends of any employee or member of the Board of Directors or Advisory Council without specific authorisation by the Chair of the Board of Directors. Hiring or contracting of persons related to the Chair will be approved by the Board of Directors.

### Responsibilities

The recruitment of employees is an integral part of the work of all senior managers who lead the whole process for their respective department. The induction of a new employee should be planned and managed by the recruiting manager.

### Recruitment Procedure

#### Establishing the Need for a new Position/ Request for Recruitment

The requirement for recruitment is usually established as a result of either the regular planning process or because an existing employee is leaving.

Where the recruitment is not a direct replacement of a departing colleague, the recruiting manager drafts a proposal describing the reasons for hiring a new employee, the tasks and job profile of the position (a job description) as well as an estimate of cost and how it will be financed. This is to be forwarded to the People Team. Any such proposal should be within the headcount and budget approved in the annual plan. If it goes beyond that, it will require SLT approval.

### Advertising / Announcements

A job vacancy may be announced in two ways as considered appropriate by the recruiting manager and the People team.

1. Internal advertisement at TI-UK and – where appropriate – elsewhere in the TI movement giving employees with the required skills (including those on fixed-term or short-term contracts or internships) a chance to apply for the job.
2. External advertisement. If no appointment is made following the internal announcement, a public (external) advertisement follows. An external public announcement will be the first option if the recruiting manager and the People Team do not see a sufficient internal recruitment base. The recruiting manager will send out an announcement and TI-UK colleagues may apply.

Normal TI-UK policy is that employees will not be eligible for internal recruitments until they have worked with TI-UK for at least a six-month period (excluding interns). All internal appointments will be with the knowledge and consent of the existing line manager of the employee. The timing of any move will be subject to the outstanding work that needs to be completed by the individual and the logistics of recruiting a replacement. Exceptions to the general policy will only be allowed with the specific approval of the existing line manager.

An external advertisement includes as a minimum publication on TI-UK's website, and may involve other advertisements on a case-by-case basis. External advertisements are required for all senior management positions.

TI-UK's internship opportunities will be published on TI-UK's website.

The Chief Executive has the discretion to make decisions on internal promotions or re-allocate existing employees to different roles without these roles being advertised internally or externally and with regards to the equal employment opportunity policy.

### The Employment Contract

The employment contract or internship letter finalises the formal recruitment process. TI-UK recognises:

- Permanent (or unlimited) contracts
- Fixed term (or limited) contracts
- Temporary contracts (up to max. 6 months)
- Intern letters of appointment (usually for 3 or 6 months)

All employment contracts will be issued in accordance with TI-UK's Standard Terms and Conditions.

## TI-UK Remuneration Policy

Owner:	<b>Finance, Risk and Audit Committee of the Board</b>	Status:	<b>Approved</b>
Last reviewed:	<b>February 2024</b>	Review date:	<b>February 2026</b>
To be read in conjunction with these other policies and procedures:		Remuneration Policy Implementation Guidelines Equal Opportunities Policy Recruitment Policy Standard Terms and Conditions Leave Policy Salary bands Grade descriptors	

### Purpose of the document

This policy aims to set TI-UK's overall approach to remuneration.

### Principles

1. TI-UK aims to operate an approach to remuneration that is both fair and transparent. It should aid TI-UK in attracting and retaining the best possible calibre of employee.
2. We do not operate a performance-based pay system.
3. TI-UK aims to benchmark salaries periodically against comparable organisations; we will also take into account internal comparisons and the financial circumstances of the organisation, in determining individual salary level and progression.
4. We take a consistent approach to all employees in the way we review salaries and other aspects of remuneration packages (such as pension contributions).
5. We will provide comparable remuneration packages for employees doing the same type of job, whichever part of the organisation they work in.
6. We expect TI-UK's average salaries in each grade to be placed on or around the mid-point of the selected benchmark; i.e. we aim to pay a fair market rate, neither under-paying nor over-paying, as befits our charitable status.
7. We regard remuneration as an important feature of staff reward and retention, but believe that other areas of our employment policies are also important in contributing to this.
8. All aspects of pay awards are subject to an affordability test.

## Implementation

The detailed implementation of the pay policy for all staff is determined by the Chief Executive in consultation with the SLT and People Team, and set out in the Remuneration Policy Implementation Guidelines.

The Chief Executive has discretion to vary the remuneration of individuals. The Board expects that this would be exercised only in exceptional circumstances, and usually in consultation with the SLT.

The Finance, Risk and Audit Committee of the Board should be consulted, in accordance with the Guidelines, in agreeing the affordability of the implementation of the annual award, including the Cost of Living Adjustment and Increment. With regard to the remuneration of Directors, it is expected that the Chief Executive will seek advice from the Finance, Risk and Audit Committee in determining salaries on recruitment, and if there are any variances thereafter in the implementation of the guidance. Roles at 7b reflect performance to 31 March annually with pay awards effective from 1 July.

The Nominations and Governance Committee will determine the salary and terms of the Chief Executive within Band 7. TI-UK's policy is to provide remuneration for its Chief Executive sufficient to attract, retain and motivate the kind of capable and dedicated person we need in this role, to help us fulfil our mission, in line with our values. We take account of the external market, performance in the job, internal relativities and the financial circumstances of the organisation in determining the Chief Executive's salary level and progression. We aim to take a consistent approach to all employees, including the Chief Executive, in the way we review salaries and other aspects of remuneration packages (such as pension contributions).

The annual review of the salary of the Chief Executive takes into account the outcome of the annual appraisal conducted by the Chair of the Board. The appraisal considers the delivery of the annual plan, financial results and performance in the role including board and senior leadership team feedback and delivery of key objectives. The review will reflect performance to 31 March annually with pay awards effective from 1 July.

Where exceptional recruitment or retention circumstances arise, we may vary the implementation of this policy.

*Note: where there are historical variations that pre-date this policy, we will continue to honour employees' existing contractual entitlements.*

## Safeguarding Policy

Owner:	<b>Chief Executive / COO</b>	Status:	Approved
Last reviewed:	November 2023	Review date:	November 2025
To be read in conjunction with these other policies and procedures:		<ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• Complaints Policy</li> <li>• Anti-Bullying and Harassment Policy</li> <li>• Whistle-blowing Policy</li> <li>• TI-S Child Protection Policy</li> <li>• Grievance and Disciplinary Procedure</li> </ul>	

### Purpose of the document

Transparency International UK (TI-UK) is committed to upholding high standards of integrity and accountability, to act according to the core values and guiding principles of the TI movement and to promote these standards and principles.

Safeguarding in its broad sense means protecting people from harm and allowing them to live in safety, free from abuse (including physical, psychological, emotional and sexual). The aim is to minimise any negative impact of our actions on the people we are trying to help, our own colleagues and other people working in the sector.

This document sets out the rules and standards which TI-UK will follow in this regard. It applies to all employees, volunteers and consultants working for TI-UK and we will – in so far as this is possible – expect similar measures to be in place in our partners and contractors. Where safeguarding incidents occur the reporting steps and support to be provided are outlined in this Policy. These highlight the need for confidentiality and ensuring that the needs of the survivor (victim) remain at the forefront of any subsequent investigation. Incidents can have gender or other sensitivities and care will be taken to ensure these are taken into account by those with an investigating role. The Chief Operating Officer who is the TI-UK Safeguarding Officer and / or the People Team are primary contact points.

### Introduction

This policy is based on Transparency International's Guiding Principles and is in line with the TI Code of Conduct. Whilst that statement provides a clear ethical framework for our global movement, individual policies – such as this one for TI-UK – reflect the particular needs and the diversity of conditions and aspirations within our movement.

TI-UK takes a risk-based approach to safeguarding. We assess how likely it is that we will encounter safeguarding matters and aim to put in place mitigation measures to reduce those risks. These are informed by incidents and feedback from our colleagues. TI-UK has very limited direct contact with vulnerable adults and children in the course of its work. We do not take that as grounds for complacency. Gender and intersectionality (race, class, sexuality, nationality, ethnicity, (dis)ability, age and other markers of power) can impact the risk of exposure to safeguarding incidents as well as access and utilisation of complaint processes. TI-UK also recognises that power imbalances exist in

society and need to be considered in identifying areas of risk as well as designing systems and processes to address incidents. We have identified four specific areas of higher risk:

- culture of bullying, sexual harassment and other forms of sexual misconduct in the Houses of Parliament. This recognises that colleagues involved in advocacy work with politicians, researchers, aides etc. may experience significant power imbalances that allow for inappropriate behaviour to occur.
- employees and consultants travelling overseas who may not act in accordance with our core values and guiding principles in their on or off-duty time.
- our third-party relationships overseas - principally other TI chapters and occasionally other NGOs to whom we make transfers of funds or grants.
- TI national chapters with legal advisory centres or similar functions that are funded by TI-UK and may come into contact with children or adults at risk.

Our mitigation measures include awareness raising of the risks, having in place policies and procedures in key areas, regularly reviewing those, staff training and a commitment to good governance including Annual Safeguarding reporting.

In addition to these areas of high risk, we are fully conscious of our duty as an employer and a chapter in the TI movement to provide a working environment that reflects our approach to safeguarding for our own employees based in the UK (see the Anti-Bullying and Harassment Policy).

We note that the guiding principles of Transparency International require us to 'respect and encourage respect for fundamental human rights and freedoms'. Those principles are quoted in full in our Code of Conduct.

### Personal Integrity

TI-UK has a Code of Conduct which constitutes a personal commitment by all employees, Board members, Advisory Council members, volunteers, interns and external contractors to a high standard of personal behaviour and forms part of all employment contracts.

### Employee relations

Colleagues in TI-UK will treat each other and those with whom we work with respect and consideration, being sensitive to our diversity, including in terms of cultural background, gender; religion; disability; family status; sexual orientation, age, etc.

We will communicate and consult with each other openly and collegially and in a manner that assists each of us to fulfil our duties and responsibilities faithfully and efficiently. TI-UK have a separate policy on anti-bullying and sexual harassment and assault in the workplace.

### Adults at risk and children

We recognise that all people have an equal right to protection from harm regardless of their gender, culture, ethnicity, age, religion, sexual orientation, or ability.

TI-UK defines an adult at risk/ vulnerable<sup>1</sup> as someone who is unable to fully exercise their rights by reason of physical or mental health, poverty or being affected by a natural or man-made disaster. We recognise that vulnerability is not always obvious.

TI-UK has very limited direct contact with adults at risk and children. However, where such contact occurs, the welfare of the adult/ child at risk will be the paramount consideration in everything we do.

TI-UK commits to being bound by the TI Child Protection Policy, including its guiding principles and definitions of abuse. That Policy is annexed.

Any employees/volunteers who come into regular professional contact on behalf of TI-UK with adults at risk or children will have training on working with such groups and will be subject, in so far as is practicable, to background and reference checks prior to employment.

Prospective board members of TI-UK and consultants may also be subject to such background and reference checks where relevant.

We also recognise that all employees have a responsibility to respond when they are concerned that an adult at risk may be at risk of harm either as a result of our own actions or those of a connected third party. Anyone that reports a concern in good faith will be protected under the TI-UK Whistle-blowing policy.

### TI Chapters, Secretariat and other Partners

TI Chapters operate independently and work with the TI Secretariat on similar integrity systems. The Secretariat have a system in place and an Integrity Manager who can provide guidance and advice ([ethics@transparency.org](mailto:ethics@transparency.org)). The TI-S Board Ethics Committee oversee arrangements. TI-UK expect all partner organisations to have arrangements in place to allow the reporting and monitoring of safeguarding concerns.

Where such partners are in receipt of donor funding passing through TI-UK, this is likely to be a condition of any sub-granting arrangement. TI runs an accreditation process for all TI chapters and when embarking on work with chapters we will supplement that process, where necessary, with additional conditions.

Programmes and activities shall be designed and undertaken in a way that protects children and vulnerable adults. This includes ways in which information about individuals in programmes is gathered and communicated, and using risk assessments that specifically take into consideration intersectionality and gender.

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<sup>1</sup> An adult at risk is aged over 18 years who may be in need of care services/support by reason of mental or other disability, age or illness; and who is or may be unable to take care of themselves or unable to protect themselves against significant harm or exploitation. Adults at risk may include people with learning disabilities, mental health illness, older people and disabled people. Additional factors such as physical frailty, chronic illness, sensory impairment, challenging behaviour, lack of mental capacity, social and emotional problems, poverty or substance misuse can place them at risk.

## Implementation and monitoring

TI-UK management will actively encourage an internal dialogue on ethics, provide guidance and training for employees and ensure that internal systems, policies and procedures are consistent with this policy. Copies of this policy and the Code of Conduct will be provided to each employee and published on our website. The Code of Conduct is annexed to all contracts of employment and signed along with them.

TI-UK has a designated Safeguarding Officer who will oversee investigation of any breaches of this policy; report them to relevant authorities where appropriate; and ensure a log of such incidents is maintained. This will normally be the Chief Operating Officer ([reportingconcerns@transparency.org.uk](mailto:reportingconcerns@transparency.org.uk)). The People Team can also be initially contacted where a complainant may wish their concern to recognise gender or other sensitivities ([hr@transparency.org.uk](mailto:hr@transparency.org.uk)). They will also take such other steps as are necessary to routinely monitor compliance, including reviewing any incidents with a view to changes in policy or procedures. They will report regularly to the TI-UK Board with anonymised data shared in the annual Safeguarding Report.

In implementing this policy, TI-UK will make all efforts to ensure that responses are survivor (victim) focused, keeping the needs of the survivor (victim) at the forefront of the investigation process. Support will be offered to survivors (victims) regardless of whether a formal investigation is carried out. This can include Information on legal, counselling, medical and psychological support. Decisions regarding support will be led by the survivor (victim) and will not be imposed by TI-UK.

Confidentiality should be maintained at all stages of the process when dealing with safeguarding concerns and information shared on a need to know basis. Confidentiality should prioritise the survivor rather than the alleged perpetrator and should not be used as an excuse for not responding to a concern.

TI-UK will not tolerate any harassment, victimisation or retaliation of those involved in reporting Safeguarding incidents or those participating in such an investigation. Forms of retaliation can include defamatory comments, creating a hostile or intimidating work environment, informal pressures, exclusion from work decisions/ events and / or social events etc.). Those found to have engaged in retaliation will have appropriate action taken including as a serious disciplinary offence under the grievance and disciplinary procedure or the anti-bullying & harassment policy. Colleagues who witness retaliation should report this immediately to the People Team.

Breaches of this policy may be considered as disciplinary incidents leading to sanctions up to and including dismissal.

## Training

Induction to TI-UK will include awareness of the importance of safeguarding and that the reporting channels and responsibilities are understood. Periodic updates shall be provided. Those with specific responsibilities for overseeing safeguarding shall ensure they undertake refresher training and that learning from sector developments are disseminated.



## Whistleblowing

For their own protection and that of others, and in order to be compliant with charity legislation, colleagues must report any breaches of this policy. Failure to report could be considered a disciplinary offence.

No one shall be discriminated against, disciplined or reprimanded for reporting concerns in good faith or requesting guidance concerning this policy whether or not the concerns are established as valid or substantiated. A number of channels exist for such reporting and these are detailed in the TI-UK Whistleblowing Policy.

## Annex: Guidance and Support to those affected by Safeguarding

The following organisations can provide guidance and support:

Topic	Find more details
<b>TI-UK Employee Assistance Provider:</b> Health Assured. Helps you deal with personal and professional problems that could be affecting your home life or work life, health and general wellbeing. It provides a complete support network that offers expert advice and compassionate guidance 24/7, covering a wide range of issues.	Log-in and registration details are supplied to all employees. Speak to the People Team if you require further details.
<b>Trade Unions:</b> if you are a member of a trade union they may have advice and information to support you.	
<b>Whistleblowing</b>	
Protect: Speak Up and Prevent Harm. Provides free, confidential whistleblowing advice.	<a href="https://protect-advice.org.uk/">https://protect-advice.org.uk/</a>
ACAS: Impartial advice on workplace rights, rules and best practice	<a href="https://www.acas.org.uk/">https://www.acas.org.uk/</a>
<b>Sexual Abuse / Violence</b>	
<p>Sexual Abuse and Support Campaign: Provides a range of different organisations that can provide information and support for those who have experienced sexual abuse or sexual violence.</p> <p>If you are over the age of 16, living in England &amp; Wales, and have been affected by any form of sexual violence or abuse, specialist and confidential support is available 24/7. Call 0808 500 2222 or visit <a href="https://247sexualabusesupport.org.uk">https://247sexualabusesupport.org.uk</a> to chat online or find out more. Details of services available in Scotland can be found at <a href="https://www.mygov.scot/rape-assault">https://www.mygov.scot/rape-assault</a></p> <p>The Victim Supports 24/7 Support line can also be accessed on 08 08 16 89 111 or via <a href="#">live chat</a>.</p> <p>A range of groups and organisations that provide 24 hour free and confidential support are listed and these cover sexual violence and abuse, male survivors of rape or sexual abuse (including trans or cis gender and non-binary people who have experienced unwanted sexual activity), adult survivors of childhood abuse and LGBTI+.</p>	<a href="https://sexualabusesupport.campaign.gov.uk/">https://sexualabusesupport.campaign.gov.uk/</a>

<b>Hate Crime</b>	
Stop Hate Crime: Provides a range of different organisations that provide support and offer guidance on those who have experienced hate crime. As well as dedicated charities that support Hate Crime there are groups focused on race, religion, sexual orientation, transgender, disability, alternative sub-cultures, domestic abuse and bullying and cyber-bullying.	<a href="https://report-it.org.uk">https://report-it.org.uk</a>
<b>Other Support Organisations</b>	
Samaritans MIND Citizens Advice	<a href="https://www.samaritans.org/">https://www.samaritans.org/</a> <a href="https://www.mind.org.uk/">https://www.mind.org.uk/</a> <a href="https://citizensadvice.org.uk">https://citizensadvice.org.uk</a>

## Annex: TI Child Protection Policy Version 3, effective 10.12.2020

### 2. Purpose of the Child Protection Policy

Transparency International (TI-S) supports the rights of children and is committed to their safety and wellbeing.

This policy is intended to provide guidance to everyone in its scope on the definitions of child abuse and on the steps to take if encountered.

Whilst TI supports its employees' right to a private life outside of their working responsibilities, it is also important to recognise that there are ways in which a staff member's conduct outside of work can severely impact the integrity and reputation of the organisation. For this reason, the requirements set out in this policy apply at all times.

All concerns and allegations of child abuse or possession or access to any material that is abusive towards children will be taken seriously by the management at TI-S and responded to immediately and appropriately - this could also involve communication to donors (in line with Data Protection laws) and referrals to the appropriate children's services, competent authorities or law enforcement agencies in line with German legislation.

### 3. Scope of the Child Protection Policy

This policy applies to **anyone** working for and under any form of contract or agreement with TI-S including prospective, current and former employees, interns, contractors, volunteers, consultants. This policy is applicable regardless of the location of the aforementioned persons.

### 4. Definitions

#### 4.1 Child

For the purpose of this policy, the definition of a child is "every human being below the age of 18" as recognized by the United Nations Convention on the Rights of a Child.

## 4.2 Child Abuse

Child abuse or maltreatment constitutes all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power.<sup>2</sup> Please refer to Annex A for detailed definitions on types of abuse.

## 5. Principles

All children regardless of age, disability, gender, racial or ethnic origin, religious belief and sexual identity have equal rights to protection and freedom from abuse and exploitation as set out in Article 19 of the UN Convention on the Rights of the Child.

TI-S does not tolerate or accept any form of child abuse.

TI-S expects all staff to comply with all relevant legislation, including labour laws in relation to child labour and to immediately report concerns or allegations of child abuse in accordance with appropriate procedures, namely the TI-S Integrity Violation Reporting Policy.

## 6. Standards of behaviour

Everyone in the scope of this policy must not:

- Exploit children
- Abuse children, physically, emotionally or sexually or by negligent treatment.
- Use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- Create, possess or access any material that is abusive towards or exploitative of children
- Engage children in any form of sexual activity or acts, including paying for sexual services or acts
- Access child pornography through any medium
- Physically assault or harm children<sup>3</sup>
- Hire children for domestic or other labour which is inappropriate given their age or developmental stage, or which interferes with (or risks interfering with) their time available for education and recreational activities, or which places them at significant risk of injury
- Invite unaccompanied children into their home, unless they are at immediate risk of injury or in physical danger

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<sup>2</sup> As per definition of the *Report of the Consultation on Child Abuse Prevention, Geneva, 29-31 March 1999, World Health Organization*). Please refer to Annex A for detailed definitions on types of abuse.

<sup>3</sup> This does not apply to acts of reasonable chastisement via a parent or legal guardian, or otherwise in a domestic or familial context, in accordance with relevant legal guidelines.

- Sleep close to unsupervised children unless absolutely necessary, in which case they must obtain the parents or legal guardians permission, and ensure that another adult is present if possible.

Everyone in the scope of this policy should wherever possible, ensure that another adult is present when working in the proximity of children.

## 7. Practice

### 7.1 Child Safe Recruitment Practices

TI-S will assess which positions would likely require the incumbent to have contact with, or work directly, with children. When this is the case, job advertisements will include this information.

In the event that a position may require contact with children, TI-S will institute appropriate screening measures, in line with respective laws, which could include:

- Specific child protection statements of responsibility in job advertisements
- Application questions requesting candidates to disclose their experience working with children
- Child safety specific interview questions
- Child safety specific reference checks in line with the German Civil Code and European and German jurisprudence
- Criminal record checks in line with the Act on the Central Criminal Register and the Educative Measures Register

Positions are assessed in terms of their level of potential interaction with children whenever a vacancy arises and context-specific needs for the position in question are determined by the hiring manager together with HR.

### 7.2 Prevention

TI-S aims to ensure, through awareness and good practice that all to which this policy applies minimise the risks to children from abuse. This includes:

- Following a risk-based approach by ensuring that all programmes assess the potential risks to children and where risks are identified, taking proactive steps to address them. This approach should form part of the programme design process and be regularly reviewed as part of programme review processes.
- Providing training and awareness raising for all persons covered under the scope of this policy to make them aware of their responsibilities to protect children from exploitation and abuse and to report concerns or allegations under the specified reporting procedures.

- As part of employee induction, the policy will be explained within the framework of the HR Manual. Each employee must confirm receipt and compliance with the policy with their signature (Please refer to Annex B for the acknowledgement form).
- Ensuring that the portrayal of children in photographs, images or video respects children's dignity and does not compromise their safety or wellbeing. The collection and use of images must be based on informed consent, respect for local customs and traditions and an honest representation of the context.
- Use of images or video requires the signature of a subject release form which includes a section where consent by a parent or guardian is required for children under the age of 18 (Please refer to Annex C for the photo subject release form as example).
- A preference for goods or clothing manufactured under conditions which are in line with child protection safeguards, when purchasing promotional or other items in connection with work. See, for example, the World Fair Trade Organisation sourcing guide: <https://wfto.com/source-or-buy-fair-trade>

### 7.3 Reporting and Investigation

Any suspected or alleged incidents of child exploitation or abuse or non-compliance with the standards of behaviour defined in this policy must be reported through one of the designated reporting channels laid out in the TI-S Integrity Violation Reporting Policy. Such incidents must also be reported to the relevant authorities (usually the police) via the Managing Director representing the organisation. This is a legal obligation.

Even when reporting to external authorities, TI-S still has a responsibility to take appropriate action internally. An external investigation does not exclude the necessity for an internal investigation (in line with the TI-S Investigation Protocol) by default. It is therefore vital that the incident is reported both internally and externally.

All suspected cases should be raised and handled in line with the reporting and whistleblowing procedure.

TI-S commits to taking appropriate and necessary action on every reported suspicion of exploitation and abuse of children based. All investigations will be based on the principles of confidentiality and procedural fairness and a commitment to protect the rights of the child.

Substantiated violations will be subject to disciplinary action up to and including termination of contract.

TI-S will ensure that action is taken to support and protect children where concerns arise regarding possible abuse in connection with the organisation's work.

## 8. Confidentiality & Data Protection

Any reporting in relation to this policy will be handled with extreme and strict confidentiality. **Any personal data may only be processed, stored, reported and transferred in compliance with the EU General Data Protection Act and the German Federal Data Protection Act.**

## 9. Related policies and procedures

The TI-S Child Protection Policy is linked to and must be read in conjunction with:

- TI-S Code of conduct
- TI-S Integrity Violation Reporting Policy
- TI-S Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) Policy
- Anti-Harassment Policy for TI-S organized events

## 10. Review Process

This policy will be reviewed initially after one year and afterwards every five years by the HR and the Integrity Officer in consultation with the Works Council, unless an earlier need is identified by the Managing Director, HR and/or the Works Council.

## 11. Appendix – A

### Types of abuse

*(as defined by the Report of the Consultation on Child Abuse Prevention, Geneva, 29-31 March 1999, WHO)*

**Physical:** Physical abuse of a child is that which results in actual or potential physical harm from an interaction or lack of an interaction, which is reasonably within the control of a parent or person in a position of responsibility, power or trust. There may be single or repeated incidents.

**Emotional:** Emotional abuse includes the failure to provide a developmentally appropriate, supportive environment, including the availability of a primary attachment figure, so that the child can develop a stable and full range of emotional and social competencies commensurate with her or his personal potentials and in the context of the society in which the child dwells. There may also be acts towards the child that cause or have a high probability of causing harm to the child's health or physical, mental, spiritual, moral or social development. These acts must be reasonably within the control of the parent or person in a relationship of responsibility, trust or power. Acts include restriction of movement, patterns of belittling, and denigrating, scapegoating, threatening, scaring, discriminating, ridiculing or other non-physical forms of hostile or rejecting treatment.

**Neglect and negligent treatment:** Neglect is the failure to provide for the development of the child in all spheres: health, education, emotional development, nutrition, shelter, and safe living conditions, in the context of resources reasonably available to the family or caretakers and causes or has a high probability of causing harm to the child's health or physical, mental, spiritual, moral or social development. This includes the failure to properly supervise and protect children from harm as much as is feasible.

**Sexual:** Child sexual abuse is the involvement of a child in sexual activity that he or she does not fully comprehend, is unable to give informed consent to, or for which the child is not developmentally prepared and cannot give consent, or that violate the laws or social taboos of society. Child sexual abuse is evidenced by this activity between a child and an adult or another child who by age or development is in a relationship of responsibility, trust or power, the activity being intended to gratify or satisfy the needs of the other person. This may include but is not limited to:

- The inducement or coercion of a child to engage in any unlawful sexual activity.
- The exploitative use of child in prostitution or other unlawful sexual practices. □ The exploitative use of children in pornographic performances and materials.

### Exploitation

Commercial or other exploitation of a child refers to use of the child in work or other activities for the benefit of others. This includes, but is not limited to, child labour and child prostitution. These activities are to the detriment of the child's physical or mental health, education, or spiritual, moral or social-emotional development.

## Appendix – B

### TI-S Human Resources Manual – Acknowledgement Form

Name of employee or intern: \_\_\_\_\_

Position: \_\_\_\_\_

Department/Unit: \_\_\_\_\_

I have received, read and I fully understand all **policies, guidelines and procedures** included in the **TI-S Human Resources Manual**.

#### In particular:

I have read the **TI-S Code of Conduct** and I fully understand its content. I confirm that I am in complete compliance with all provisions of the TI-S Code of Conduct and that I will continue to observe the spirit of the Code in all my activities on behalf of TI.

TI-S Drug-Free Workplace Policy, the TI-S Child Protection Policy and the TI-S Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) Policy and fully understand their content I will comply with the guidelines set out in these policies and understand **that failure to do so might result in disciplinary or legal action**.

Date: \_\_\_\_\_ Signature: \_\_\_\_\_

Please sign and return to People Team. This document will be filed in the employee's or intern's personal file.



## Appendix – C

### Subject Release Form

Name, Surname

Contact details

Age (if under 18)          Parent / guardian to sign below OR

Permission given from parent / guardian confirmed by TI-S staff

Date

Photographer

Country

Use of photograph(s) by Transparency International

I grant Transparency International the right to use the photographs (and any other reproductions or adaptations of the photographs) alone or with any wording, in any material including the internet, for an unlimited time.

Use of photograph(s) by other organisations

I grant Transparency International the right to supply the photographs to third parties to promote and raise awareness of the fight against corruption

☐ YES      ☐ NO

Agreement of subject

I understand that I have no copyright or ownership of the photographs.

I release the photographer and Transparency International from all claims and liability relating to the photographs.

I agree that Transparency International can store my personal data in relation to the photographs (such as name, surname), but they will not provide my personal data to any other party, or use my personal data for any other purposes.

Please tick here if you want your identity disguised in the photographs   ☐

Signature of subject or parent / guardian      Signature of TI-S staff

(Please print name)      Date / Place

## Security Policy

Owner:	<b>Chief Operating Officer</b>	Status:	Approved
Last reviewed:	June 2024	Review date:	June 2026
To be read in conjunction with these other policies and procedures:		<ul style="list-style-type: none"><li>• Security Procedure</li><li>• Travel Expenses Policy</li><li>• Code of Conduct</li><li>• Whistleblowing Policy</li></ul>	

### Purpose of the document

TI-UK defines security as the personal safety and protection of its employees and other persons to whom it has responsibilities. The policy outlines the risk-based approach that we take to travel with a particular focus on overseas travel. However, any travel away from the London office for business purposes has security risks.

### Scope

This policy applies to all TI-UK employees, trustees, interns, consultants and volunteers undertaking travel at the request of TI-UK for business purposes. Aspects of this policy may be relevant to consultants depending on the assignment, their location and whether they undertake travel overseas at the request of TI-UK.

TI-UK works with national chapters of TI and other national and international partner organisations. However, TI-UK employees must *not* assume that partners will give due attention to their security and must ensure that adequate security procedures are in place without relying on those partners.

### Duty of Care

TI-UK recognises that it has moral and legal duties to take reasonable measures to look after the safety and security of employees working on our programmes. This policy and procedure is designed to explain the scope of TI-UK's responsibilities in fulfilling this duty of care, and how these obligations are performed and maintained. TI-UK undertakes all reasonable and practicable measure to ensure it complies with all relevant legislation and statutory instruments with respect to workplace health and safety of its people.

The framework consists of:

- The Security Policy – this document
- Security Procedure
- Training on TI-UK's policy and procedure and external training as deemed appropriate by line managers/ Security Focal points
- A team of Security Focal points and organisational security lead (COO)
- Travel approval mechanisms and forms
- Insurance to cover adverse events
- A Crisis Management Team and Protocol

## Security Risk Appetite

Some of TI-UK's work requires travel, occasionally to difficult environments. The particular nature of our work may occasionally challenge powerful interests and place our people at risk.

Risk	Appetite
<b>People:</b> The risk that we are unable to provide our people with an environment that allows them to perform to their best or undertake their work in a safe and flexible environment.	<b>People:</b> There is no good reason to put individuals at unnecessary danger whilst recognizing that our mission requires us to travel to places that are considered to be high risk. We shall be open to ensure and demonstrate that our workplace provides as safe and secure environment for all to perform well and that our blended working delivers organisational success. We will do all we can to ensure equality of opportunity and to prevent any kind of racism, bullying or discrimination.
<b>Security:</b> The risk that the data and information we use remains secure and that our operations are not disrupted through cyber-attacks.	<b>Security:</b> Our data and information can be viewed as high risk and as such we shall monitor our systems to ensure they remain robust despite changing threats.

## Increased Risks to TI-UK's people

We recognise:

- **High-risk locations** – TI-UK's international work requires it to undertake programmes / projects in countries that are high-risk due to local political, social and economic conditions.
- **Politically-sensitive nature of TI-UK's core business** – some political leaders, business leaders and individuals disagree or are implicated with particular policy positions, research or exposure through the programmes of TI-UK.
- **Limited safety and security resources of some Chapters/ Partners** - when working overseas, TI-UK people may be reliant on the capacity of the Chapters to manage risk and in many cases they will have inadequate resources to do so.

## Guiding Principles

TI-UK are guided by the following principles in relation to security risk management:

1. **Priority of Life:** in dangerous situations, the safety of human life is the highest priority above TI-UK assets and / or policy objectives.
2. **Right to Withdraw:** anyone should feel free to withdraw from a situation they consider to be unsafe. Safety first!
3. **Duty of Care:** TI-UK have a duty of care to its people to ensure their health and safety at work.
4. **Conduct:** All should be positive and respectful of the people they are working with, and the culture in which they are working. They are expected to refrain from coercive or exploitative behaviour and ensure their behaviour is in line with the TI-UK Code of Conduct.
5. **Discipline:** Breaches or non-compliance are treated seriously, and disciplinary action may be taken.

6. **Gender:** Individuals in the same context, may perceive risk differently or face different exposure to safety hazards and security threats based on their gender, sexual orientation and / or gender identity. As such each individual can approach the same situation with different vulnerabilities and respond differently to actual or perceived threats. Despite women and men being equal, women in their diversity are disproportionately affected by some security threats with exposure to sexual and gender-based violence often a high risk. It is necessary therefore to put in place measures to reduce risk and promote resilience. All risk management should be viewed through a gender lens.
7. **Responsibility:** responsibility for ensuring safety and security lies with Management. However, it is incumbent on all employees to play a proactive role in maintaining a safe workplace.
8. **Involvement with arms:** In the course of duties, weapons or arms must not be carried or taken up under any circumstances.
9. **Armed group/ guards / escorts:** TI-UK employees will not travel with armed guards unless essential to their mission. Relations with armed actors will be kept formal and deliberate. In no way must any TI-UK employees act in such a way as to jeopardise the impartiality and independence of the organisation's work. These requirements do not apply to interactions with legitimate military personnel.

## Safety and Security Values

The following values are considered to be best practice with respect to safety and security matters and should be used to guide decision making in TI-UK.

1. **Responsibility and accountability for yourself and others:** All employees are responsible for acting at all times in a manner which reduces safety and security risks and making sure they remain acceptable. TI-UK will assist, support and equip you to do this. We all have a clear responsibility for each other, and to TI-UK, as a whole. We need to be mutually accountable. This may require us to act and intervene in a situation, no matter how difficult or awkward in order to prevent threats and hazards occurring.
2. **Right to say no. Safety First!:** All our people have the right to withdraw from a risky situation or event should they feel the risks are unacceptable, or they are experiencing fear. We will make sure that those exposed to risk are able to make an informed choice about the level of risk they are exposed to. All employees who travel overseas to countries with medium risk or above will receive relevant personal security training (including hostile environment training where appropriate) at least once every three years.
3. **Local action orientated decision-making:** We recognise that those closest to safety and security situations will often be able to come up with the best solutions, and we trust our people to do so. Local decisions may need to take account of the different risks faced by those visiting and who do not live within that community. We will empower our people to act quickly and responsibly.
4. **Need to share information:** All our people have an obligation to pass on safety and security related information. TI-UK encourages such openness because it provides learning opportunities from both events that occur as well as 'near-miss' incident reporting.

## Responsibilities

The Chief Executive has overall responsibility for the security and personal safety of TI-UK employees and property. In practice this is delegated to line managers at every level. Responsibility for monitoring standards of security management lies with the COO as Lead Security Focal Point.

All employees are expected to adhere to this Security Policy. All relevant employees should have safety and security responsibilities clearly articulated in their job descriptions and performance reviews, and be held accountable accordingly. They are accountable to their line managers, colleagues, partners and team members. All TI-UK employees and consultants are responsible for following all security procedures and for actively contributing to a positive security culture.

Line managers are responsible for ensuring that employees are adequately trained and briefed; for maintaining contact during any travel; and for ensuring that there are proper procedures in place for hibernation, relocation or evacuation where necessary.

Any breach of the TI-UK security principles and procedures must be reported via line management and to the COO.

TI-UK have assigned the following roles and responsibilities:

<b>Position</b>	<b>Roles &amp; responsibilities</b>
Chief Executive	<ul style="list-style-type: none"> <li>• Overall responsibility for the security and personal safety of TI-UK employees</li> <li>• Approving travel on an exceptional basis to high or severe risk countries (FCDO Red Areas)</li> <li>• Overseeing crisis management</li> </ul>
Chief Operating Officer	<ul style="list-style-type: none"> <li>• Lead Security Focal Point</li> <li>• Maintenance of safety and security system</li> <li>• Chair's Safety and Security Group</li> <li>• Approving travel on an exceptional basis to medium risk countries (FCDO Yellow Areas)</li> </ul>
Crisis Management Team	<ul style="list-style-type: none"> <li>• Chief Executive and / or Senior Management Team members selected to handle the particular incident</li> <li>• Constituted to deal with an event that threatens the existence of TI-UK people, property or programmes. Examples include kidnap/ abduction, significant risk to TI-UK's reputation.</li> </ul>
Security Focal Point	<ul style="list-style-type: none"> <li>• Promotion of employee security and ensuring knowledge and compliance with the current security policies and procedures.</li> <li>• Reviewing incident report forms</li> </ul>
Line Manager	<ul style="list-style-type: none"> <li>• Approving travel risk assessments</li> <li>• Ensuring travelling employees are suitable trained</li> <li>• Reviewing incident report forms</li> <li>• Conduct risk assessments at project conception so that security can be addressed in budget and planning</li> </ul>
Employees and Consultants	<ul style="list-style-type: none"> <li>• Complying with the Security policy and safety and security procedure</li> </ul>

	<ul style="list-style-type: none"> <li>• Completing travel risk assessment for all overseas travel</li> <li>• Undertaking safety and security training</li> <li>• Reporting incidents</li> </ul>
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## Travel Approval

The person responsible for approving employee travel is determined by the FCDO risk rating as described below. All travel approval forms must be submitted to the relevant signatory at least two weeks before travel.

### Risk Levels

Employees must assess the level of security risk for each country/location to be visited. A variety of sources may be consulted including, FCDO travel advice, and TI-UK's insurers. Whilst FCDO ratings will be the default benchmark, TI-UK reserves the right to assign a higher or lower rating. The levels are as follows:

#### High/Red

Corresponding to the FCDO 'red' category, which advises against all travel. This includes proposed travel to 'red' areas in countries with a lower overall risk. TI-UK employees will not normally travel to these locations. A waiver from the Chief Executive will be required for any such travel.

Proposed travel to high or severe risk countries will be immediately notified to the SFP who will advise the Chief Executive as to whether it will be approved or not. For severe risk countries the presumption is that travel will *not* be approved and it should not be planned unless advice has been sought in advance via the SFPL or CE.

Active ongoing conflict with significant restrictions on movement, targeting of international workers including NGOs. Kidnapping of workers is a serious risk and/or government harassment or surveillance place staff at significant risk<sup>1</sup>.

#### Medium/Yellow

Corresponding to the FCDO 'yellow' category which advises against all but essential travel. This includes proposed travel to 'yellow' areas in countries with a lower overall risk. Travel to these locations will require approval from the Security Focal Point Lead (COO).

Regular civil unrest, intermittent internal conflict, bureaucratic restrictions on INGOs or on national staff, political environment unpredictable. Countries immediately post-conflict might also be high risk. High crime rates with murder and assault being prevalent, criminal or terrorist targeting of international workers.

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<sup>1</sup> At the time of revision (June 2024), Afghanistan, Belarus, Burkina Faso, Burundi, Central African Republic, Chad, Haiti, Iraq, Iran, Israel, Lebanon, Libya, Mali, Niger, North Korea, the Occupied Palestinian Territories, Russia, Somalia, Somaliland, South Sudan, Syria, Ukraine, Venezuela, and Yemen would be considered high risk.

### Low/Green

This includes areas where the FCDO recommends 'see our travel advice' ('green' areas) or does not provide any specific restrictions. Employees should be aware that there may still be significant risks in such areas. Travel to these locations will require approval from their line manager.

Occasional civil unrest, no internal factional conflict, significant levels of crime. Occasional political or bureaucratic state impediments or harassment.

### Informed consent

All TI-UK employees, and visitors must access a full security briefing prior to departure to any other country. Line managers must check that this has been done prior to travel to any country with high or medium risk levels. If no briefing material exists, advice should be sought via the SFP.

All new employees should receive a security briefing as part of their induction. Any changes to security procedures must be shared with employees immediately.

All employees have a right to decide whether the security risks in any location are acceptable to them (with the exception of a mandated evacuation, see below). If this is not the case, they have a right to decline to travel.

### Funding for Security

All budgets and funding proposals should include consideration of funding for international security including training. This is essential to ensure employees are trained and equipped appropriately to maximise their safety in any context.

### Safety and Security training

All employees who travel to areas with medium risk or higher must attend personal safety and security training if they have not done so within the past three years, whether with TI-UK or in previous employment. Where appropriate, employees should also receive Hostile Environment Awareness Training.

In the event that a suitable training course is not available prior to travel, employees should complete the IFRC online course available through the IFRC Learning Platform<sup>2</sup>.

### Incident reporting

All security incidents including 'near misses', must be reported immediately to line managers and to the SFP using the incident reporting form. A log will be kept of all incidents including 'near misses' by the COO.

### Driving

Anyone driving a vehicle whilst on TI-UK business must be insured and hold a valid driving licence for the relevant country.

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<sup>2</sup> <http://www.ifrc.org/en/get-involved/learning-education-training/learning-platform1/>

Anyone driving a vehicle for TI-UK business must adhere to the driving regulations of the country and must not drive under the influence of drugs or alcohol.

All vehicles used for TI-UK work must be regularly maintained and fit for use. They must be fitted with working seatbelts and these must be worn by all passengers, at all times. Where taxis are fitted with seatbelts, these must be worn by all TI-UK passengers, at all times.

### Evacuation Visas and travel permits

All employees and consultants who may be subject to evacuation/relocation are responsible for ensuring that they have any necessary visas or travel permits and that these are kept up to date.

### Insurance

All employees and consultants travelling with TI-UK will be covered by international travel insurance that includes evacuation.

Employees should be aware that special insurance may be required for higher risk locations. This can be arranged in consultation with the COO. It is the responsibility of employees and security focal points to ensure that insurance cover includes the countries of proposed travel.

### Safety and Security whistleblowing

Any safety and security related concerns should be reported through line management or to the COO. In the event that such concerns either cannot be raised through normal reporting channels or have not been addressed by management and represent a serious threat of injury to employees, or damage to TI-UK reputation or property, employees should escalate those concerns to the appropriate level as per the TI-UK Whistleblowing Policy.

### Waivers

Where a waiver to this policy is sought this must be submitted to the Chief Executive through line management detailing the reason for the waiver and the duration. Only in exceptional circumstances will waivers be approved.

### Security of Assets

All TI-UK employees have a responsibility to take reasonable care of TI-UK's physical assets. This includes taking measure to protect them from damage, theft and misuse. At no point should employees place their own safety at risk in order to protect such assets.



## Senior Advisor Policy

Owner:	<b>People Team</b>	Status:	<b>Approved</b>
Last reviewed:	<b>September 2024</b>	Review date:	<b>September 2026</b>
To be read in conjunction with these other policies and procedures:		<ul style="list-style-type: none"><li>• Code of Conduct</li><li>• Safeguarding Policy</li><li>• Social Media Policy</li><li>• Advocacy and Political Engagement Policy</li><li>• Anti-Bullying and Harassment Policy</li><li>• Anti-Bribery Policy</li><li>• Volunteering Policy</li><li>• Bring your Own Devices Policy</li><li>• Data Protection and Privacy Policy</li></ul>	

### Purpose of the document

This policy is for senior advisors recruited by TI-UK and colleagues working with them. It includes the activities of the UK Chapter as well as the TI Global Thematic Networks (Defence and Security and Global Health). It seeks to set out expectations and ensure that prior to appointment as a senior advisor the framework of how the role will operate is clearly understood and that expectations can be met.

Transparency International is the UK's leading independent anti-corruption organisation. Through the advisory role you will pay a part in our work to achieve our vision for a world where people's lives, government, business and society are free from corruption. A world where, the health of our institutions is enhanced so they can better support the people they are intended for; a world where we can trust the integrity of those in authority and in business, and a world where there is no impunity for the corrupt at home or abroad.

Our values define the ways in which we act and the behaviours we look for:

- We will act with integrity.
- We will value and respect differences.
- We will work collaboratively across Transparency International, our global Movement and with partners.
- We will have the courage to demand better of ourselves and others.

### The Policy

A senior advisor is an individual who provides their time, skills, networks and expertise. Unlike a volunteer a stipend is paid (although in some cases the individual may request no stipend to be paid). The charity's relationship with the senior advisor is based on trust and is not intended to have the obligations associated with employment. No payment, other than the stipend (where applicable) and reimbursement of agreed out-of-pocket expenses, is made by TI-UK to people who give their time as senior advisors.

Senior advisors can support the work of TI-UK in a number of ways including:

- Championing and promoting our work

- Sharing specialist Anti-Bribery/ Anti-Corruption knowledge and sector knowledge and expertise
- Connecting us with strategically relevant partners, networks, institutions and communities
- Helping to deliver strategic projects
- Providing mentoring, coaching or training
- Raising funds, including connecting us with their networks

TI-UK is committed to ethical behaviour in all aspects of our workplace and those who represent the organisation. Our standards in relation to advocacy engagement, handling conflicts of interest, being non-partisan, accepting or offering gifts and hospitality provide the framework as to how we aim to be open and transparent in all the activities we undertake. Senior advisors are expected to ensure they are aware of the various standards and policies and reflect them in their ethical-centred work for TI-UK.

A senior advisor should not be considered as a suitable alternative for a paid employee job role that is currently vacant. Arrangements for organisations / firms to provide pro-bono support are outside of this policy. A separate volunteering policy is in place and should be considered where no stipend is to be paid.

### Relations with Paid Employees

TI-UK is committed to ensuring that the work of senior advisors complements the work of paid employees. As with volunteering it will not be used primarily as a substitute for paid work. It can however represent a significant 'gift-in-kind' where for example an individual offers their time and expertise whilst they are on 'garden-leave' or have taken 'retirement'.

Steps will be taken to ensure that employees at all levels are clear about the roles of senior advisors and to foster good working relationships between them and paid employees.

TI-UK recognises that management and supervision of senior advisor roles takes additional time and this needs to be considered when such roles and their key contact points are being planned for.

All senior advisors will have a named key contact who will be a paid employee.

### What senior advisors can expect from us

To ensure senior advisors enjoy their role, get the most out of it and that relationship with TI-UK are mutually beneficial, our commitment is to:

- Always treat senior advisors with respect, consideration and appreciation
- Ensure senior advisors have a clear idea of responsibilities, including the length of time we would like them to be involved in a project
- Give senior advisors information about the training and support we can provide to help them carry out their role
- Provide senior advisors with support through regular meetings or discussions in line with the role
- Offer fair, honest and timely feedback on a senior advisors contribution
- Provide feedback on how their work is making a difference.

## What we expect from our senior advisors

Whether they are paid employees or senior advisors the same high standards are expected. We would ask senior advisors to:

- Always treat colleagues, supporters, donors, and partners with respect, consideration and appreciation
- Act professionally at all times and when representing TI-UK in public
- Act in a way that does not discriminate against or exclude anyone
- Provide as much notice as possible if they are unable to fulfil their advisory commitment, or if they no longer wish to be involved in a project
- Ask their key contact if they don't understand their role and responsibilities and require further guidance.

## Board Committee

The TI-UK Governance Framework sets out the various Board committees and the Terms of Reference for each together with the general guidelines as to how these are effectively managed. The framework recognises that a Committee may wish to access specialist knowledge and advice as part of their remit.

Senior advisors may be invited to attend all or part of a Committee meeting and this will be discussed and agreed in advance with the Chair of the Committee and the Chief Executive (or their delegated representative). Whilst the advisors are not part of the Committee decision making process they are expected to declare any potential conflicts of interest for areas they are providing guidance or advice on.

## Diversity, Equality and Inclusion

TI-UK is committed to having senior advisors that reflect the diverse communities we live in and work with. Our core values include respect, trust and fairness and our desire is to create a work place environment where diversity is celebrated and respected, everyone is valued whatever their background.

TI-UK is committed to ensure that it does not discriminate on the basis of protected characteristics: gender, race, colour, age, religion, national origin, sexual orientation, pregnancy, marital status, medical condition, veteran status, disability, or any other legally protected category.

Appointments to all senior advisor positions will be made on merit. TI-UK is committed to open, fair, and transparent recruitment and selection. Family members, friends and organisations with which employees, their families or friends are associated, will not be accorded preferential treatment and they will be expected to disclose any conflict of interest in the selection of a senior advisor to a role.

TI-UK does not condone, accept or ignore any forms of discrimination or unacceptable behaviour including racism by a senior advisor.

## Recruitment

All senior advisor positions must have a role description. This will set out the key tasks / deliverables, their key contact point and the envisaged time commitment and duration of the role.

The role description and recruitment timetable will be approved by the People Team. The process for selecting and appointing a senior advisor can vary between different roles. The People Team will be

consulted to agree as to whether the role is best advertised or whether specific individuals may be contacted/ canvased for their interest in undertaking the position mindful of the need to demonstrate commitments to promote diversity, equality and inclusion.

An informal interview may be undertaken to provide relevant information and to explore the aspirations and the experiences an individual can bring. Such interviews are not a competitive process, and the sole selection criteria is suitability for the role. A personal reference will be routinely required and taken up to help confirm suitability as a senior advisor and for the specific role. In some cases a due diligence check may also be necessary.

Senior advisors must read and agree to the TI-UK Code of Conduct before they can commence their role. They must agree in writing to deliver the key tasks and to commit the necessary time.

The recruitment process and the documentation to agree the senior advisor role at no time creates a contract of employment between TI-UK and the advisor.

If changes to the role or the key contact point occur, the senior advisor will be informed in writing.

A senior advisor can reference their role at TI-UK for the duration of the time this is in place on LinkedIn or other similar professional virtual media sites. Where the role will benefit from use of business cards these can be obtained from TI-UK.

### Safeguarding / Speaking Up

TI-UK recognise that there is collective responsibility to ensure accountability to communities and people we work with funders and the wider public in relation to Safeguarding. We recognise that from time to time, things in the workplace may go wrong. Whether it is Safeguarding, Bullying and Harassment, Racism, Fraud, Bribery, Corruption or other matters that require Whistleblowing. We assure senior advisors that we shall act on their concerns and we encourage a Speak Up culture.

Such integrity is a key value of the work undertaken by TI-UK and the TI movement. Failure to meet the obligations of the Safeguarding Policy, TI-UK Code of Conduct or other relevant policies, may lead to a senior advisor being asked to step back from their role either temporarily or permanently, or other appropriate action taken.

If a senior advisor role was considered to be eligible for a Disclosure and Barring Service (DBS) check, or equivalent then this will be made clear in the role description.

### Training & Support

Senior advisors will have a wide range of skills, knowledge, networks and insights gained through their education, work, volunteering and life experiences. We aim to ensure that senior advisors have the necessary skills and background to undertake the role that has been identified.

We recognise that understanding of how TI-UK operates and that access to individuals and teams may be necessary in order to undertake the role effectively. Induction will be provided and the management and support that the role is mutually agreed to require will be provided.

Senior advisors and paid colleagues receive different levels of support, training and personal development opportunities and this will be mutually respected. Access to training beyond what the role may require including courses should not be viewed as an automatic right.

## Health & Safety

Senior advisors are expected to take reasonable care of themselves and others whilst undertaking the role, and to follow any health and safety advice and instructions given. Accidents and incidents (including accidents/ incidents that may have led to injury – near misses) should be immediately reported.

The systems and procedures that TI-UK follow include access to health and safety policy and guidance. Appropriate information, supervision and training required to undertake the role safely will be provided.

Employers Liability, Public Liability and Professional Indemnity insurance cover is in place whilst undertaking activities. Motor/ travel insurance cover is not provided and senior advisors are expected to ensure their own insurance cover applies to such activities.

## Data Protection

TI-UK will protect senior advisors information, ensuring it is held securely, and confidentially and only accessed by authorised individuals and in line with the TI-UK Data Protection and Privacy Policy.

Senior advisor roles that require access to TI-UK IT systems will be expected to follow the requirements of the Bring your Own Device Policy and the Data Protection and Privacy Policy. It is not envisaged that senior advisor roles will require provision of TI-UK devices such as laptops.

## Confidentiality

Senior advisors will not either during or after the end of their role divulge or communicate to any person or organisation, or make use of for their own benefit any information of a secret, private or confidential nature related to TI-UK. This includes its employees, suppliers, agents, distributors, donors or business partners.

Senior advisors are expected to use their best endeavours to prevent the unauthorised publication or misuse of any confidential information.

At the end of their role, or at the request of TI-UK all documents, papers, computer hardware or software (including all copies) that a senior advisor may have prepared or come into their possession shall be returned to TI-UK. No copies may be retained without the prior written consent of TI-UK.

## Intellectual Property

When agreeing to undertake a senior advisor role at TI-UK, all Intellectual Property<sup>1</sup> created by them as part of their role or credited to them during the term of their appointment remains the property of and is owned by TI-UK. On departure all these rights and obligations continue.

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<sup>1</sup> all rights in patents, utility models, trademarks, service marks, logos, getup, trade names, internet domain names, copyright (including rights in computer software), design rights, moral rights, database rights, topography rights, plant variety rights, confidential information and knowledge (including know how, inventions, secret formulae and processes, market information, and lists of customers and suppliers), and rights protecting goodwill and reputation, in all cases whether registered or unregistered

## Feedback & Complaints

Whilst we seek to ensure that the experience of being a senior advisor is positive and rewarding, we recognise that at times they may experience difficulty in their role or they may wish to share feedback or make a complaint. In the first instance they should talk with their key contact who will try and resolve the matter, get advice or share feedback. Resolving difficulties at an early stage is always encouraged and we aim to review feedback and learn from it.

If an issue cannot be resolved, then the matter can be escalated by either the senior advisor or their key contact to the People Team and / or the Chief Operating Officer and the TI-UK Complaints Policy and Procedure will be utilised.

Where concerns are raised about the behaviour of a senior advisor or their approach to the role, responsible colleagues will approach the senior advisor directly to discuss the concerns with a view to amicably and openly resolving difficulties at an early stage.

## Recognition

We value the skills and experience that senior advisors bring to TI-UK. We want to ensure that they feel their time with us is rewarding and that appropriate recognition is given to acknowledge and celebrate their work. Key contacts are responsible for ensuring that appropriate recognition takes place.

## Leaving TI-UK

Senior advisors are free to cease their role at any time. When deciding to complete their time with us, they can do this by speaking with or writing to their key contact. Where for example an assignment has not been completed we would ask you to provide us with adequate notice so that we have opportunity to ensure a good handover, either to a paid colleague or another senior advisor in order that the efforts that have been made are best utilised.

Upon leaving we offer an exit interview to allow feedback and reflection not only on your role, but also on the experience. We encourage senior advisors to remain engaged in the work of TI-UK and where future roles are of interest to get involved again.

There could be occasions where we may need to ask a senior advisor to cease the role. This may be because TI-UK feels the role no longer supports organisation needs and priorities. Any senior advisor role that exceeds 12 months duration will be reviewed annually to ensure it continues to reflect the needs of TI-UK and that it is best provided through that means only. TI-UK may also decide at any time, that in their view the senior advisor is no longer able to satisfactorily carry out their role. Where this occurs, we will give as much notice as possible to them. In all cases, the senior advisor will be treated fairly, with dignity and respect.

On the basis of their advisory work, a senior advisor can request a reference that reflects their time and role at TI-UK. Such requests should be made via the People Team.

## Sick Leave Policy

Owner:	<b>People Team</b>	Status:	Approved
Last reviewed:	August 2023	Review date:	August 2025
To be read in conjunction with these other policies and procedures:		<ul style="list-style-type: none"><li>• Capability Policy &amp; Procedure</li><li>• Flexible Working Policy</li><li>• Leave Policy</li></ul>	

### Purpose of the document

TI-UK recognises the Health and Wellbeing of their people. This policy outlines our sick leave entitlement available for TI-UK employees. Details include entitlements, how payments will be calculated, and the process for approving and recording of such leave.

### Sick Leave

If you fall ill in the office, The Office Group reception will arrange for a First Aider for you. They will advise on medical attention as necessary; where advised, arrangements will be made for transport to take you home, to hospital or to a doctor.

If you are not able to attend work (at the office or virtually) due to sickness, you must inform your line manager by 9.30 am on the first day of absence. You should provide the reason for the absence and its likely duration. Where you are absent for seven calendar days or less, you must log the absence on Cascade and self-certify the leave on your first day returning to work.

If the sickness absence lasts for more than seven calendar days (regardless of how many days the employee works each week), you must obtain a medical certificate from the GP or hospital doctor and send or arrange for it to be sent immediately to the People Team. If your absence is due to continue beyond the expiry of your current certificate, you are required to send subsequent certificates prior to expiry so that your line manager knows if you are returning to work. On returning to work you may be asked to provide a statement indicating fitness to return.

TI-UK pay enhanced sick pay of eight weeks of sick leave at full pay and a further four weeks at half pay or the London Living Wage, whichever is greater. This will be followed by a further 20 weeks of Statutory Sick Pay (SSP). SSP eligibility starts when you are absent for four or more days in a row. In the first year of employment, the allowance will be pro-rata to the start date. The intention in granting this benefit is to ensure that our people are free from financial worry should they suffer a prolonged and incapacitating illness. If, in the opinion of the People team this purpose is not being achieved, TI-UK reserves the right to withdraw this benefit in any individual case.

Employees are expected to maintain contact with TI-UK during an extended absence to report on their progress at least weekly and their expected date of return to work. The method and level of communication will be agreed with your line manager/the People team.

After an extended period of absence (more than 2 weeks) the line manager will carry out a return to work interview to assess progress, update you on any key work related matters during your absence and discuss where necessary any support that TI-UK needs to provide.

Sick leave may not be accrued from year to year.

### Unauthorised absence

If you fail to report for duty at the appropriate time and fail to follow the above procedure for sickness, this will be treated as unauthorised absence and could result in disciplinary action. Where an employee fails to produce valid sickness certificates this will also be classified as unauthorised absence. Employees should note that payment will not be made for unauthorised absences.



## Social Media Policy

Owner:	<b>Chief Operating Officer</b>	Status:	<b>Approved</b>
Last updated:	February 2024	Review date:	February 2026
To be read in conjunction with these other policies and procedures:		<ul style="list-style-type: none"> <li>• Advocacy and Political Engagement Policy</li> <li>• Anti-bullying and Harassment Policy</li> <li>• Data Protection &amp; Privacy Policy</li> <li>• Grievance and Disciplinary Procedures</li> <li>• Legal Policy &amp; Procedures</li> <li>• Private Sector Engagement Policy</li> <li>• Safeguarding Policy</li> </ul>	

### Purpose of the document

Social media allows for people to exchange information, opinions and experiences to learn, develop and be social. Communicating the work of TI-UK on social media is positive both for the organisation and programmes whilst ensuring greater awareness of anti-bribery and corruption and the TI Movement. This policy sets out a framework for conduct when using social media during your time at TI-UK. It provides advice to avoid issues that might arise by inappropriate or careless use of social media.

This policy is built around two different elements: one, representing our organisation through social media and two, using personal social media. Whether you're handling a corporate account or using one of your own, you should remain productive and avoid damage to the brand and reputation of TI-UK.

Whilst TI-UK sees the positive value of social media no employee is required to maintain a personal professional social media profile and colleagues should not place expectations on those who choose to permanently or from time to time either withdraw from all social media or specific platforms/communities etc.

### Principles

1. DO share TI-UK social media posts, events, research and advocacy on business social networking sites/ platforms
2. DO follow, celebrate and engage with TI-UK and other parts of the Movement on their social media feeds
3. DO list TI-UK as your employer (if you wish to) in relevant social media profiles used for professional networking
4. DO express your own opinion – just make sure it's clear when you're not speaking on behalf of or representing TI-UK
5. DON'T allow your actions on social media to inadvertently challenge the view of TI-UK being impartial and or its reputation for objective evidence-driven research & advocacy
6. DON'T share confidential information about TI-UK or your colleagues
7. DO be polite and respectful treating social media interactions as you would meeting people professionally in person
8. DON'T post content that bullies or harasses others, is illegal or may offend
9. DO keep safe on work-related social media and seek help and guidance if you need it
10. DO keep a healthy and proportionate balance of time at work on social media.

## Scope

This policy applies to all forms of social media and any new forms of social media that come into existence during your time with us. It applies to online platforms as well as communities like blogs, social networks, chat rooms and forums<sup>1</sup>. Likes, shares, retweets, use of hashtags, who and what you follow etc. give impressions about who you are and the opinions you hold form part of social media commentary.

## The Policy

During your employment/ engagement you should consider the values and ethos of TI-UK when using social media. You must not post content on-line or on social media that:

- Damages TI-UK's brand or reputation
- Challenges the view of TI-UK being impartial and / or its reputation for objective evidence-driven research & advocacy
- Uses TI-UK or its associated brands<sup>2</sup> to promote personal opinions
- Discloses confidential or financial information
- Breaches data protection laws
- Infringes copyright or intellectual property laws
- Bullies or harasses others
- Is illegal or may offend<sup>3</sup>.

## Campaigning & Political activity

TI-UK as a charity is required to follow Charity Commission [Guidance](#) on Campaigning and Political Activity. Colleagues should ensure they are familiar with the aspects as they relate to the work and activities of TI-UK.

- Any charity can become involved in campaigning and in political activity which further or support its charitable purposes. However, a charity must not give its support to any one political party.
- It may express support for particular policies which will contribute to the delivery of its own charitable purposes so long as its independence is maintained, and perceptions of its independence are not adversely affected.
- A charity may engage with a political party in ways that supports its own charitable purposes. In doing so, it must remain politically neutral and should consider working with other parties to help ensure public perceptions of neutrality. Trustees should be as open and transparent as possible about any engagement their charity has with a political party.
- A charity may publish the views of local councillors, Members of Parliament, Welsh Assembly Members, and election candidates, and also the views of government Ministers and Shadow spokespeople, where these views relate to the charity's purposes, and publishing them will support the charity's work in some way.
- Once an election has been called, charities that are campaigning will need to take special care to ensure their political neutrality. A charity must never indicate to its supporters which candidate to support in an election.

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<sup>1</sup> Examples include: Facebook, Instagram, LinkedIn, Slack, Tik Tok, Wikipedia, Yammer, YouTube, Vimeo, WeChat, X (formerly Twitter)

<sup>2</sup> TI Defence & Security, TI Global Health etc.

<sup>3</sup> Threatening, abusive or insulting language with the intention to cause alarm, distress or harass individuals

In line with Charity Commission guidance, Trustees, members of the Advisory Council, employees, consultants and volunteers can personally support a particular political party or (during an election) a particular candidate, something TI-UK as a charity cannot do. However, care must be taken to ensure that content posted in their personal capacity avoids being associated with TI-UK.

## Representing TI-UK

Some colleagues represent TI-UK by handling corporate social media accounts or speak on our organisation's behalf. When you're operating/ contributing to a corporate social media account, we expect you to act carefully and responsibly to protect TI-UK's brand and reputation.

We expect you to:

- Ensure our Communications Team are aware when you're about to share any major-impact content.
- Be respectful, polite and patient, when engaging in conversations on our behalf.
- Ensure you're aware of Communication Team guidance in relation to TI-UK as an organisation and the programmes.
- Avoid speaking on matters outside your field of expertise when possible. Everyone should be careful not to answer questions or make statements that fall under somebody else's responsibility or that have not been approved by the appropriate channel.
- Follow our confidentiality policy and data protection policy and observe laws on copyright, trademarks, plagiarism and fair use. This also applies to third-party content posted on organisational social media.
- Avoid deleting or ignoring comments for no reason and ensure that you listen and reply to criticism where this is felt necessary.
- Never post discriminatory, offensive or libellous content and commentary. Removing as quickly as possible/ alerted that any such content has been posted on channels or where that content could be considered to be a criminal offence. This also applies to third-party content, posted on organisational social media.
- Correct or remove any misleading or false content as quickly as possible.
- Follow any guidance related to safety and security of colleagues in the Movement issued by Chapters and / or the Secretariat.

## Fundraising on Social Media

The Code of Fundraising applies to fundraising on social media platforms and is designed to ensure fundraising is open, honest and respectful. Guidance should be sought from fundraising colleagues before undertaking any campaigns on social media.

## Using Personal Social Media

We can't restrict what you post on social media, but we expect you to adhere to our confidentiality policies at all times. While we recognise and respect your right to freedom of speech we also caution you to avoid breaching our anti-bullying or harassment policies or posting something that might make your collaboration with your colleagues more difficult.

When using social media in a personal capacity you must be aware that you may be identified as an employee or associated with TI-UK. Personal social media posts should not conflict with general

contractual obligations that could cause reputational damage or other harm to the organisation as set out in the policy. Colleagues with personal social media accounts should be mindful of how their profile is publically viewed and act accordingly. Consideration should be given to ensuring that the safety and security of colleagues across the Movement is respected and distinguishing between details suitable for internal circulation and externally including social media.

Trustees, senior management, and specialist roles where they are well known in their field of expertise and / or publically associated with TI-UK, must take particular care as personal views published may be misunderstood as expressing TI-UK's view.

Identification with TI-UK for commercial or personal purposes is prohibited. You should not claim nor imply that you are speaking on behalf of TI-UK unless permission is granted to do so (this applies to all events and media including social). This encompasses use of logos, brand names, slogans or any other trademark.

Colleagues should not use social media as a forum to air their grievances, such as about their employment, colleagues or employer. A range of internal avenues exist to raise complaints, concerns, grievances and whistleblowing.

Our general advice is to:

- Ensure others know that your personal account or statements don't represent TI-UK. You shouldn't state or imply that your personal opinions and content are authorised or endorsed. Whilst on social media there is little protection between how a personal and official account is perceived; using a disclaimer such as "opinions are my own" or where it needs to be clearer "opinions represent myself and not TI-UK" can help to avoid misunderstandings.
- Recognise that on business social networking sites such as LinkedIn users will be aware that the purpose is to show their work experience and professionalism.
- Recognise where someone may be challenging your specific views and posts with them challenging more generally whether TI-UK is impartial or whether our research and advocacy is evidence-driven and objective. In these cases, we advise alerting the Communications Team for guidance on next steps (if any).
- Utilise personal and professional site options where these exist and / or have distinct profiles and networks to separate professional networks and postings from personal/social.
- Consider privacy settings that restrict general public access beyond your personal networks or access to historic posting that no longer represents your views.
- Seek advice in advance from the Communications Team if you are unsure regarding your social media presence.
- Avoid sharing intellectual property such as trademarks on a personal account without approval. Confidentiality policies and laws always apply.
- Avoid any defamatory, offensive or derogatory content. It may be considered as a breach of law and / or TI-UK's anti-harassment policy, if directed towards colleagues, donors or partners.

### Use of Personal Social Media during working hours

We allow access to personal accounts at work. However, we expect you to act responsibly and ensure your productivity and job responsibilities are not negatively affected. An excessive amount of time whilst at work is not permitted.

## Roles and Responsibilities

The Communications Team is available for support and to provide guidance on posting day to day content and how to respond to complaints, criticism or abusive comments<sup>4</sup>.

There may be occasions when an organisational response is considered to be appropriate. This could be through an organisation comment or a more senior post-holder comment. The balance between organisational reputation/ professional solidarity with colleagues will be weighed against unnecessary provocation etc. Where content is deleted or removed as a result of an apparent breach of law, reporting the matter to the police or other relevant body may be required. You should be clear about how the breach took place and respond in line with your social media and/ or HR policies.

High profile announcements or dealing with a social media crisis will often involve statements that have had input and approval from the Chief Executive/Senior Leadership Team/ the Chair/ Board of Trustees depending on the circumstances. Checks as to whether an incident is required to be reported by the Trustees as a Serious Incident to the Charity Commission will be undertaken by the Chief Executive/Chief Operating Officer and the Chair.

This policy applies to Trustees, members of the Advisory Council, employees, consultants and volunteers. The Chief Operating Officer is responsible for ensuring that the process for agreeing Codes of Conduct reference this policy. The policy review dates may be revisited where significant changes to social media platforms occur that require specific adaption/ consideration.

## How TI-UK enforces this Policy

We monitor all social media postings on our corporate accounts.

TI-UK may consider behaviour that breaches this policy to be gross misconduct. Any person who misuses organisational or personal social media may face disciplinary action under the grievance and disciplinary procedure.

If you breach this policy inadvertently (for example by posting materials in error), you may receive a reprimand that could include management advice or a formal sanction depending on the circumstances.

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<sup>4</sup> Guidance is also available at <https://www.strawberrysocial.com/safety-resources/>

## Travel Expenses Policy

Owner:	Financial Controller	Status:	Approved
Last reviewed:	August 2023	Review date:	August 2025
To be read in conjunction with these other policies and procedures:		<ul style="list-style-type: none"><li>Security Policy</li></ul>	

### Purpose of the document

This policy covers expenses that can be claimed and reimbursed whilst undertaking business travel for TI-UK. It should be read in conjunction with the TI-UK Security Policy.

### Travel Expenses

Official travel must be directly related to the work of TI-UK, be approved in advance and as a charity reflect economical use of our resources. The following rules apply:

- Only economical and bona fide travel expenses will be reimbursed.
- Only economy airfares will be paid, unless otherwise decided by the Chief Executive / COO (which will be in exceptional circumstances only).
- When private travel is added onto TI-UK related travel, employees will notify their line manager before the trip and will meet any extra costs that this may entail.

TI-UK expects its employees to keep costs to a minimum, taking into account factors such as personal safety and the need to perform effectively. This applies even if an external organisation is reimbursing the expenses incurred.

The following expenses may be reclaimed from TI-UK:

- Air fares, train and other travel costs not booked directly through TI-UK's approved travel agent
- Hotels and meals for overnight stays
- Costs of visas
- Vaccinations and immunisations recommended by a health professional
- Costs of taxis (including Uber) if travelling late at night (after 10pm) or public transport is not available; is insecure or if there is another legitimate business reason (such as travel times between meetings)
- Medical costs whilst travelling (although these should then be claimed back via TI-UK's insurance)
- Car mileage where alternative transport is not available or not cost effective
- Any other costs legitimately incurred during the course of TI-UK business

In order to claim back expenses, the employee must fill out TI-UK's expense form, attach appropriate evidence including receipts, invoices, tickets and/or vouchers, and submit it to their line manager for approval.

All expenses claims and supporting evidence must be kept on file. Boarding passes (including digital boarding passes) for air travel should be retained and filed along with expenses claims as some donors require these as evidence of travel.

Failure to produce evidence of expenditure may result in the expenses claim being rejected.

### Approved Travel Agent

TI-UK have in place an approved travel agent for booking air fares and hotels. The travel agent is able to source for some airlines and destinations charity fares and rates. These tickets are not only provided at a discount but usually have flexibility to allow changes (for a fee) rather than cancelling the ticket. Where the traveller books air fares and / or hotel accommodation directly they must attach a copy of the quote received from the approved travel agent to indicate that a cheaper alternative was possible.

### Daily allowance (per diem)

TI-UK will also pay a flat rate daily allowance of £10 for travel involving an overnight stay. This allowance is capped at £50 per trip. It is expected to cover:

- coffees, light meals or snacks
- phone / internet charges
- travel by public transport
- exchange rate fluctuations
- tips and gratuities

The allowance should be claimed through the expenses claim form and receipts do not need to be provided.

### Passports and Visas

The traveller is responsible for obtaining and carrying valid travel documents such as passports and visas. Costs of visas can be reimbursed by providing appropriate documentation. Additional charges or fees incurred due to the fault of the employee (e.g. due to late application) cannot be reimbursed. Where possible, visas should be obtained before travel and not on entry to reduce the corruption risk.

Employees required to travel overseas are expected to maintain a valid passport at their own cost.

### Car Mileage

Use of personal cars is only an allowable expense if alternative transport is not available or not cost effective. If a TI-UK employee has to use a personal car (to get to a meeting for example), a mileage allowance can be claimed back via the expenses form. Rates may vary but the current allowance is 45p per mile.

### Alcohol

TI-UK will not generally pay, or reimburse employees for the costs of alcohol except for official events. Costs of alcohol should not be booked to restricted grants. Donors usually have clear guidelines on this which we must respect.

If employees are travelling and consume alcohol this should not be reclaimed on expenses. It should be covered from personal resources, as it would be in the UK. Similarly, alcoholic drinks bought for colleagues in the UK or overseas cannot be reclaimed on expenses.

There may be occasional circumstances in which it is felt appropriate to entertain and supply alcohol. Expenses claims in these circumstances will be considered on a case by case basis and will need to be approved by the Chief Executive/ COO in advance. The default option is that they will not be approved, so employees should note the risk that they may have to cover the cost.

## Volunteering Policy

Owner:	<b>People Team</b>	Status:	<b>Approved</b>
Last reviewed:	July 2024	Review date:	July 2026
To be read in conjunction with these other policies and procedures:		<ul style="list-style-type: none"> <li>• Code of Conduct for Volunteers</li> <li>• Internship Policy</li> <li>• Safeguarding Policy</li> <li>• Social Media Policy</li> <li>• Advocacy and Political Engagement Policy</li> <li>• Anti-Bullying and Harassment Policy</li> <li>• Anti-Bribery Policy</li> <li>• Bring your Own Devices Policy</li> <li>• Data Protection and Privacy Policy</li> </ul>	

### Purpose of the document

The TI movement, and TI-UK operating as a UK charitable company recognises the importance and value of volunteerism. Volunteers can play a vital role in helping achieve our mission. In addition to being grateful for their support, we also wish to ensure that their experience is safe, rewarding and enjoyable.

This policy is for volunteers recruited by TI-UK and colleagues working with those volunteers. It seeks to set out expectations and ensure that prior to appointment as a volunteer the framework of how the role will operate is clearly understood and that expectations can be met.

Transparency International is the UK's leading independent anti-corruption organisation. Through volunteering with us you will pay a part in our work to achieve our vision for a world where people's lives, government, business and society are free from corruption. A world where, the health of our institutions is enhanced so they can better support the people they are intended for; a world where we can trust the integrity of those in authority and in business, and a world where there is no impunity for the corrupt at home or abroad.

Our values define the ways in which we act and the behaviours we look for in our volunteers:

- We will act with integrity.
- We will value and respect differences.
- We will work collaboratively across Transparency International, our global Movement and with partners.
- We will have the courage to demand better of ourselves and others.

### The Policy

A TI-UK volunteer is an individual who is unpaid and provides their time, skills, networks and expertise freely and without concern for financial gain. The arrangement is voluntary on both sides. The charity's relationship with volunteers is based on trust and is not intended to have the obligations associated with employment. No payment, other than the reimbursement of agreed out-of-pocket expenses, is made by TI-UK to people who give their time as volunteers.



Volunteers can support the work of TI-UK in a number of ways including:

- Championing and promoting our work
- Sharing specialist Anti-Bribery/ Anti-Corruption knowledge and sector knowledge and expertise
- Connecting us with strategically relevant partners, networks, institutions and communities
- Helping to deliver strategic projects
- Providing mentoring, coaching or training
- Raising funds, including connecting us with their networks
- Recruiting and supporting other volunteers.

TI-UK is committed to ethical behaviour in all aspects of our workplace and those who represent the organisation. Our standards in relation to advocacy engagement, handling conflicts of interest, being non-partisan, accepting or offering gifts and hospitality provide the framework as to how we aim to be open and transparent in all the activities we undertake. Volunteers are expected to ensure they are aware of the various standards and policies and reflect them in their ethical-centred volunteering for TI-UK.

TI-UK has a policy for paid interns (Internship Policy) and volunteering is not considered to replace that option or be utilised for tasks that an intern role can provide. Indeed the TI-UK internship policy indicates that they will not be used to substitute for substantive, longer term posts. The term 'internships' is not intended to cover unpaid work experience which TI-UK may also occasionally offer and that would be covered by this policy.

A volunteer should not be considered as a suitable alternative for a paid employee job role that is currently vacant. Arrangements for organisations / firms to provide pro-bono support are outside of this policy. Bespoke arrangements are put in place where students from universities undertake defined assignments as part of a programme monitored by their academic institution.

### Relations with Paid Employees

TI-UK is committed to ensuring that the work of volunteers complements the work of paid employees, and that it will not be used primarily as a substitute for paid work. It can however represent a significant 'gift-in-kind' where for example an individual offers their time and expertise whilst they are on 'garden-leave' or have taken 'retirement'.

Steps will be taken to ensure that employees at all levels are clear about the roles of volunteers, the role of paid staff in relation to volunteers, and to foster good working relationships between them and volunteers.

TI-UK will consider the need for training for all those working alongside and managing volunteers. They also recognise that management and supervision of volunteer roles takes additional time and this needs to be considered when volunteer roles and their key contact points are being planned for.

All volunteers will have a named key contact who will be a paid employee.

## What volunteers can expect from us

To ensure volunteers enjoy their role, get the most out of it and that relationship with TI-UK are mutually beneficial, our commitment is to:

- Always treat volunteers with respect, consideration and appreciation
- Ensure volunteers have a clear idea of responsibilities, including the length of time we would like them to be involved in a project
- Give volunteers information about the training and support we can provide to help them carry out their role
- Provide volunteers with support through regular meetings or discussions in line with the role
- Offer fair, honest and timely feedback on a volunteer's contribution
- Provide feedback on how their work is making a difference.

## What we expect from our volunteers

Whether they are paid employees or volunteers the same high standards are expected. We would ask volunteers to:

- Always treat colleagues, supporters, donors, and partners with respect, consideration and appreciation
- Act professionally at all times and when representing TI-UK in public
- Act in a way that does not discriminate against or exclude anyone
- Provide as much notice as possible if they are unable to fulfil their volunteering commitment, or if they no longer wish to be involved in a project
- Ask their key contact if they don't understand their role and responsibilities and require further guidance.

## Diversity, Equality and Inclusion

TI-UK is committed to having volunteers that reflects the diverse communities we live in and work with. Our core values include respect, trust and fairness and our desire is to create a work place environment where diversity is celebrated and respected, everyone is valued whatever their background.

TI-UK is committed to ensure that it does not discriminate on the basis of protected characteristics: gender, race, colour, age, religion, national origin, sexual orientation, pregnancy, marital status, medical condition, veteran status, disability, or any other legally protected category.

Appointments to all volunteer positions will be made on merit. TI-UK is committed to open, fair, and transparent recruitment, selection and volunteering. Family members, friends and organisations with which employees, their families or friends are associated, will not be accorded preferential treatment and they will be expected to disclose any conflict of interest in the selection of a volunteer to a role.

TI-UK does not condone, accept or ignore any forms of discrimination or unacceptable behaviour including racism by a volunteer.

## Recruitment

All volunteer positions must have a role description. This will set out the key tasks / deliverables, their key contact point and the envisaged time commitment and duration of the role.

The role description and recruitment timetable will be approved by the People Team. The process for selecting and appointing a volunteer can vary between different roles. The People Team will be consulted to agree as to whether the role is best advertised or whether specific individuals may be contacted/ canvased for their interest in undertaking the position mindful of the need to demonstrate commitments to promote diversity, equality and inclusion.

An informal interview may be undertaken to provide relevant information and to explore the aspirations and the experiences an individual can bring. Such interviews are not a competitive process, and the sole selection criteria is suitability for the role. A personal reference will be routinely required and taken up to help confirm suitability as a volunteer and for the specific role. In some cases a due diligence check may also be necessary.

Volunteers must read and agree to the TI-UK Code of Conduct before they can commence their volunteer role. They must agree in writing to deliver the key tasks and to commit the necessary time.

The recruitment process and the documentation to agree the volunteer role at no time creates a contract of employment between TI-UK and the volunteer.

If changes to the role or the key contact point occur, the volunteer will be informed in writing.

## Safeguarding / Speaking Up

TI-UK recognise that there is collective responsibility to ensure accountability to the communities and people we work with, funders and the wider public in relation to Safeguarding. We recognise that from time to time, things in the workplace may go wrong. Whether it is Safeguarding, Bullying and Harassment, Racism, Fraud, Bribery, Corruption or other matters that require Whistleblowing. We assure volunteers that we shall act on their concerns and we encourage a Speak Up culture.

Such integrity is a key value of the work undertaken by TI-UK and the TI movement. Failure to meet the obligations of the Safeguarding Policy, TI-UK Code of Conduct for Volunteers or other relevant policies, may lead to a volunteer being asked to step back from volunteering temporarily or permanently, or other appropriate action taken.

If a volunteer role was considered to be eligible for a Disclosure and Barring Service (DBS) check, or equivalent then this will be made clear in the role description.

## Training & Support

Volunteers will have a wide range of skills, knowledge, networks and insights gained through their education, work, volunteering and life experiences. We aim to ensure that volunteers have the necessary skills and background to undertake the role that has been identified.

We recognise that understanding of how TI-UK operates and that access to individuals and teams may be necessary in order to undertake the role effectively. Induction will be provided and the management and support that the role is mutually agreed to require will be provided.

Volunteers and paid colleagues receive different levels of support, training and personal development opportunities and this will be mutually respected. Access to training beyond what the role may require including courses should not be viewed by a volunteer as a right or a substitute for financial gain.

## Health & Safety

Volunteers are expected to take reasonable care of themselves and others whilst volunteering, and to follow any health and safety advice and instructions given. Accidents and incidents (including accidents/ incidents that may have led to injury – near misses) should be immediately reported.

The systems and procedures that TI-UK follow include access to health and safety policy and guidance. Appropriate information, supervision and training required to undertake a volunteer role safely will be provided.

Employers Liability, Public Liability and Professional Indemnity insurance cover is in place whilst undertaking volunteer activities. Motor/ travel insurance cover is not provided and volunteers are expected to ensure their own insurance cover applies to volunteer activities.

## Data Protection

TI-UK will protect volunteer information, ensuring it is held securely, and confidentially and only accessed by authorised individuals and in line with the TI-UK Data Protection and Privacy Policy.

Volunteer roles that require access to TI-UK IT systems will be expected to follow the requirements of the Bring your Own Device Policy and the Data Protection and Privacy Policy. It is not envisaged that volunteer roles will require provision of TI-UK devices such as laptops.

## Confidentiality

Volunteers will not either during or after the end of their role divulge or communicate to any person or organisation, or make use of for their own benefit any information of a secret, private or confidential nature related to TI-UK. This includes its employees, suppliers, agents, distributors, donors or business partners.

Volunteers are expected to use their best endeavours to prevent the unauthorised publication or misuse of any confidential information.

At the end of their role, or at the request of TI-UK all documents, papers, computer hardware or software (including all copies) that a volunteer may have prepared or come into their possession shall be returned to TI-UK. No copies may be retained without the prior written consent of TI-UK.

## Intellectual Property

When agreeing to undertake a volunteer role at TI-UK, all Intellectual Property<sup>1</sup> created by them as part of their role as a TI-UK volunteer or credited to them during the term of their volunteering remains the property of and is owned by TI-UK. On departure all these rights and obligations continue.

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<sup>1</sup> all rights in patents, utility models, trademarks, service marks, logos, getup, trade names, internet domain names, copyright (including rights in computer software), design rights, moral rights, database rights,

## Feedback & Complaints

Whilst we seek to ensure that the experience of volunteering is positive and rewarding, we recognise that volunteers at times may experience difficulty in their role or they may wish to share feedback or make a complaint. In the first instance they should talk with their key contact who will try and resolve the matter, get advice or share feedback. Resolving difficulties at an early stage is always encouraged and we aim to review feedback and learn from it.

If an issue cannot be resolved, then the matter can be escalated by either the volunteer or their key contact to the People Team and / or the Chief Operating Officer and the TI-UK Complaints Policy and Procedure will be utilised.

Where concerns are raised about the behaviour of a volunteer or their approach to the role, responsible colleagues will approach the volunteer directly to discuss the concerns with a view to amicably and openly resolving difficulties at an early stage.

## Recognition

We value the skills and experience that volunteers bring to TI-UK. We want to ensure that volunteers feel their time with us is rewarding and that appropriate recognition is given to acknowledge and celebrate their work. Key contacts are responsible for ensuring that appropriate recognition takes place.

## Leaving TI-UK

Volunteers are free to cease their role at any time. When deciding to complete their time volunteering for us, they can do this by speaking with or writing to their key contact. Where for example an assignment has not been completed we would ask you to provide us with adequate notice so that we have opportunity to ensure a good handover, either to a paid colleague or another volunteer in order that the efforts that have been made are best utilised.

Upon leaving we offer an exit interview to allow feedback and reflection not only on your role, but also on the volunteering experience. We encourage volunteers to remain engaged in the work of TI-UK and where future roles are of interest to get involved again.

There could be occasions where we may need to ask a volunteer to cease volunteering. This may be because TI-UK feels the role no longer supports organisation needs and priorities. Any volunteer role that exceeds 12 months duration will be reviewed annually to ensure it continues to reflect the needs of TI-UK and that it is best provided through voluntary means only. TI-UK may also decide at any time, that in their view the volunteer is no longer able to satisfactorily carry out their role. Where this occurs, we will give as much notice as possible to the volunteer. In all cases, the volunteer will be treated fairly, with dignity and respect.

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topography rights, plant variety rights, confidential information and knowledge (including know how, inventions, secret formulae and processes, market information, and lists of customers and suppliers), and rights protecting goodwill and reputation, in all cases whether registered or unregistered

On the basis of their voluntary work, volunteers can request a reference that reflects their time and role at TI-UK. Such requests should be made via the People Team.

## Whistleblowing Policy

Owner:	<b>Chief Operating Officer</b>	Status:	<b>Approved</b>
Last reviewed:	September 2022	Review date:	September 2024
To be read in conjunction with these other policies and procedures:		<ul style="list-style-type: none"><li>• Code of Conduct</li><li>• Safeguarding Policy</li><li>• Anti-Bullying and Harassment Policy</li><li>• Grievance and Disciplinary Procedures</li></ul>	

### Purpose of the document

The Policy is designed to ensure that you can raise your concerns about wrongdoing or malpractice within TI-UK without fear of victimisation, subsequent discrimination, disadvantage or dismissal. It is intended to encourage and enable you to raise serious concerns within TI-UK rather than ignoring an issue or 'blowing the whistle' outside.

### What is Whistleblowing

'Whistleblowing' means the reporting of suspected misconduct, illegal acts or failures that affect others and is in the public interest. If you are considering raising a concern you should read this policy first as it will explain:

- The types of issues that can be raised
- How the person raising a concern will be protected from victimisation and harassment
- How to raise a concern; and
- What TI-UK will do to respond.

Employees are often the first to realise that something may be seriously wrong. 'Whistleblowing' is considered by TI-UK to be a valuable contribution and it is not disloyal to Speak Up. To help ensure the highest possible ethical standards that are at the heart of TI-UK's mission such freedom of speech is encouraged and this policy aims to achieve this.

### Scope of this Policy

This policy is intended to enable those who become aware of wrongdoing to report their concerns at the earliest opportunity so that they can be properly investigated.

The policy is not intended to replace existing procedures, for example:

- If your concern relates to your treatment as an employee, you should raise it under the existing grievance or anti-bullying and harassment procedures. Personal grievances are not covered by whistleblowing law, unless your particular case is in the public interest. You may contact the Advisory, Conciliation and Arbitration Service (Acas) for help and advice on resolving a workplace dispute (<https://www.acas.org.uk/>)
- If your concern is about the standard of service provided by TI-UK, or actions taken or not taken by us then this should be raised as a complaint. This mechanism applies to those who are not workers of TI-UK (see definition below).

- If your concern is related to a partner funded by TI-UK, this should be raised as a complaint. Please see the Policy Handbook [Policy Handbook](#) for the latest procedures and ways in which your complaint will be handled. Complaints can be submitted via: [reportingconcerns@transparency.org.uk](mailto:reportingconcerns@transparency.org.uk). Such complaints are passed on to the relevant organisation and TI-UK seeks assurances that appropriate action is being taken and any wider learning is being adopted. Issues related to safeguarding, bullying and harassment and fraud may also be passed onto donors to follow-up as part of funder reporting requirements.
- If your concern is related to other entities in the TI movement (e.g. the Secretariat or a country Chapter) and does not involve TI-UK workers then you should consult the Secretariat for details of how ethical and integrity issues are handled. This guidance highlights that each entity will have their relevant policies and procedures in place. The Secretariat information includes details of the Board Ethics Committee of the International Board of Directors who can provide advice (<https://www.transparency.org/en/the-organisation/ethics-integrity>).

### Who this policy applies to

This policy applies to everyone who is considered to be a TI-UK worker. This means TI-UK employees, contractors working directly for TI-UK, agency workers, interns and volunteers. The relevant statutory protection applies in law only to employees of TI-UK, however in so far as possible, we shall aim to treat all workers within the spirit of the Public Interest Disclosure Act 1998.

### What should be reported?

Any legitimate concerns that you have about the work of TI-UK or the conduct of Board members, employees or others acting on behalf of the organisation that:

- are not in keeping with TI-UK policies
- fall below established standards of practice; or
- are improper behaviour.

These might relate to:

- conduct which is an offence or a breach of the law (a criminal offence has been committed or failing to comply with any other legal obligation)
- a miscarriage of justice
- risk or actual damage to the environment
- health and safety of the public and / or employees are in danger
- conduct that breaches TI-UK's Safeguarding and Code of Conduct policies
- racial, sexual, disability or other discrimination
- unauthorised use of funds including public funds or other assets
- possible fraud and corruption including breaches of TI-UK's Anti-Bribery Policy
- someone is covering up wrongdoing.

This list is not exhaustive. Attempts to conceal any of the above will also be considered improper behaviour. A qualifying disclosure is one that is made in good faith by an individual and the first four in the list above, together with covering up such wrongdoing, meet the protected disclosures defined in law.



## Protecting the Whistleblower

This policy takes account of the Public Interest Disclosure Act 1998 which protects workers making disclosures about certain matters of concern, when those disclosures are made in accordance with the Act's provisions and in the public interest.

The Act makes it unlawful for TI-UK to dismiss anyone or allow them to be victimised on the basis that they have made an appropriate lawful disclosure in accordance with the Act.

## Harassment/Victimisation/ Retaliation

TI-UK recognises that a decision to report a concern can be a difficult one to make. If you honestly and reasonably believe what you are saying is true, you should have nothing to fear as you will be doing your duty to your TI-UK employer and your colleagues.

TI-UK will not tolerate any harassment, victimisation or retaliation towards a whistleblower or those participating in such an investigation. Forms of retaliation can include defamatory comments, creating a hostile or intimidating work environment, informal pressures,, exclusion from work decisions/ events and / or social events etc.) We will take appropriate steps to protect those in the workplace who raise a concern in good faith regardless of the outcome of that investigation. Those found to have engaged in retaliation will have appropriate action taken including as a serious disciplinary offence under the grievance and disciplinary procedure or the anti-bullying & harassment policy. Colleagues who witness retaliation should report this immediately to the People Team.

TI-UK will not insert confidentiality stipulations ('gagging clauses') into any settlement reached as a result of a whistleblowing case.

## Support to Whistleblowers

Through the process employees will be:

- Given full support from senior management
- Your concerns will be taken seriously and investigated in a timely manner with feedback provided on the status of the investigation
- You will be encouraged to access relevant support from the Employee Assistance Programme and / or your union (where you're a member)

For those who are not TI-UK employees, appropriate advice and support will be provided wherever possible.

The TI-UK Employee Assistance Provider: Health Assured provides 24/7 support and guidance. Log-in and registration details are supplied to all employees. Speak to the People Team if you require further details.

If you wish to obtain free and confidential advice, the independent charity, Protect, can advise you. They can be contacted via <https://protect-advice.org.uk/> or helpline on 020 3317 2520.

## Raising a Concern

Who should you raise your concern with?

This will depend on the seriousness and sensitivity of the issues involved and who is suspected of the wrongdoing.

You should normally raise concerns with your Line Manager/ Director and / or the People Team. If your concern is about your Line manager/ Director, then you should contact the Chief Operating Officer and / or the Chief Executive. If your concern is about the Chief Operating Officer, then you should contact the Chief Executive.

If the concern is about the Chief Executive, then you should contact the Chair of the Board ([Chair@transparency.org.uk](mailto:Chair@transparency.org.uk)) who will decide how the investigation will proceed. If your concern is about the Chair of the Board then you should contact the Chair of the Ethics Advisory Panel ([Ethics@transparency.org.uk](mailto:Ethics@transparency.org.uk)) who will decide how the investigation will proceed.

#### How to raise a concern?

You can raise a concern in person, by telephone or in writing. The earlier you express your concern, the easier it normally is to take action. You will need to provide:

- the nature of the concern and why you believe it to be true
- the name (s) of the wrongdoer
- the background and history of the concern (giving relevant dates etc)

If there are two or more of you who have the same experience or concerns then you may wish to share this jointly.

You are welcome to invite your trade union, professional association or a friend to be present during any meetings or interviews in connection with the concerns you have raised.

#### What TI-UK will do?

TI-UK will respond to your concerns as quickly as possible. In discussing and testing your concerns this is not the same as either accepting or rejecting them.

In order to be fair to all employees, including those who may be wrongly or mistakenly accused, initial enquiries will be made to decide whether an investigation is appropriate, and if so what form it should take.

The concerns raised may be:

- investigated by the Board/ management or through the grievance and disciplinary procedure
- referred to an audit firm for investigation
- referred to a donor (where funding requirements request this)
- referred to the Charity Commission
- referred to another prescribed body
- referred to the police.

We shall aim to acknowledge your concern within one week and the person investigating your concern will write to you within ten working days with details as to how they propose to deal with the matter,

information on support mechanism and telling you whether further investigations will take place and if not, why not.

TI-UK will aim to complete all investigations within a three month period. It is likely that you will be interviewed to ensure that your disclosures are fully understood. Any interview can be arranged away from the workplace, if you wish, and a union, professional association or friend may accompany you in support. Unless there are legal reasons as to why this cannot be done, you will be kept informed of the progress and outcome of any investigation.

### Confidentiality

All concerns raised will be treated in confidence and every effort will be taken not to reveal your identity if that is what you wish. If disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of your disclosure without your help, so you may be asked to come forward as a witness. If you agree to this, you will be offered advice and support.

### Anonymous Allegations

This policy encourages individuals to put their name to any allegations whenever possible. If you do not tell us who you are it is more difficult for us to protect your position or to give you feedback. Concerns expressed anonymously are much less powerful but they may be considered at the discretion of TI-UK. In exercising this discretion, the factors to be taken into account will include:

- the seriousness of the issues raised
- the credibility of the concern; and
- the likelihood of confirming the allegation from other attributable sources.

A request for confidentiality is not the same as making an anonymous allegation. You can request that your identity remains confidential and the necessary steps will be taken to ensure this after having been discussed with you.

### Untrue Allegations

If you make an allegation in good faith and reasonably believe it to be true, but it is not confirmed by the investigation, we will recognise your concern and you have nothing to fear. If however, you make an allegation frivolously, maliciously and/ or for personal gain, appropriate action that could include disciplinary action, may be taken. Persisting in raising allegations that have been investigated and / or concluded could also result in disciplinary action.

### Making Disclosures to the Press/ Social Media

Disclosures to the press and / or via social media whilst a complaint is being investigated can often prove counterproductive and, in some circumstances may constitute misconduct. Whilst the media has an important role to play in assisting whistleblowing, this policy also seeks to protect those wrongly accused of misconduct from being identified. As such, media disclosures may be treated as a disciplinary matter in accordance with our grievance and disciplinary procedures.

### Record Keeping & Monitoring

TI-UK will maintain a register of all whistleblowing reports, the details of any investigation undertaken and the outcomes. This will be confidential to the Safeguarding Officer (normally the Chief Operating Officer) and the Ethics Advisory Panel. They will also take such other steps as are necessary to routinely monitor the effectiveness of this policy. The annual Safeguarding Report will include a summary of

whistleblowing complaints received and any lessons learned. The report will not include names or any details considered confidential, or related to an on-going investigation.

TI-UK reserves the right to release the register if required in law to do so.

### How the Matter can be Taken Further

TI-UK hopes that this policy will provide you with the opportunity to have your concerns raised and addressed. If you are not satisfied with the action taken and you feel the matter is in the public interest the following are our prescribed contacts:

- the Charity Commission: [Report a Serious Incident](#)
- the External Auditor: Haysmacintyre, 10 Queen Street Place, EC4R 1AG, telephone 020 7695 5500.
- [the Environmental Agency](#) , telephone 03708 506 506
- [the Equality and Human Rights Commission](#)
- [the Health & Safety Executive](#) , telephone 03000 003 1647
- [the Fundraising Regulator](#) , telephone 0300 999 3407
- [the Information Commissioner](#) , telephone 0303 124 113
- [HM Revenue & Customs](#)
- your trade union
- the police
- other relevant bodies prescribed by legislation (see [UK Government web-site link](#) )

A public disclosure to anyone outside of the prescribed contacts could take you out of the protection of the Public Interest Disclosure Act and this Policy. You should not disclose information that is confidential to TI-UK or to anyone else except to those on the list of prescribed contacts.

TI-UK reserves the right to make a referral to any of the above agencies without your consent.

## Nov 2024 Changes to Policies

### Changes since the manual was updated in September 2024:

Anti Bullying & Harassment	<ul style="list-style-type: none"><li>• Various changes to reflect the Worker Protection Act 2023 effective from October 2024 and updated guidance from Equality &amp; Human Rights Commission (September 2024).</li></ul>
Anti-Fraud	<ul style="list-style-type: none"><li>• Updated legislation reference</li><li>• Alternative reporting routes enhanced.</li></ul>
Managing Performance Policy and Procedure	<ul style="list-style-type: none"><li>• New – reflects revised and standardised approach to managing performance during the year</li><li>• Replaces Appraisal policy</li></ul>