



This **Code of Conduct** applies to all TLM's staff and representatives, including employees, interns, temporary workers, seconded employees, volunteers at all levels, consultants, visitors, contractors, advisors, directors, trustees, funders, partners and anyone representing TLM for an activity or purpose. It is a requirement that they understand and abide by the terms laid out in TLM's Safeguarding Policy and Code of Conduct in and outside working hours. The underpinning principles of the Code of Conduct are that:

- ✓ The welfare of children and vulnerable adults is paramount.
- ✓ It is the responsibility of all staff and representatives to behave with integrity, maturity and good judgement, acting in a manner towards all individuals that is safe, ethical, and consistent with the values and behaviours expected from TLM, and under applicable local laws and regulations.
- ✓ All breaches of the Code of Conduct must be reported.

This Safeguarding Code of Conduct is consistent with the Inter-agency Standing Committee (IASC) Task Force on Protection from Sexual Exploitation and Abuse<sup>1</sup> and covers the prevention and **protection** of children, vulnerable adults and all individuals from **exploitation, abuse, bullying and harassment**. The focus of which is particularly **on sexual exploitation and abuse** arising from a **misuse of power, authority, and trust** by TLM staff and representatives.

## A - Recruitment and On-boarding

### *I will:*

- **Disclose** any criminal record, caution, reprimand, warning, or other relevant information on the **TLM Self-Declaration of Criminal & Disciplinary Record Form**.
- Notify TLM if I am found guilty of any criminal charges during my employment (or association) with TLM.
- **Attend mandatory safeguarding training** during my induction or engagement with TLM and regular refresher training thereafter.

## B - Working in direct or indirect contact with children and vulnerable adults.

### *I will:*

- **Always wear TLM identification** when in direct contact with children/ vulnerable adults.
- Use positive, non-violent methods to **manage behaviour**.
- **Work in partnership** with colleagues and other organisations to promote and safeguard the welfare of children, vulnerable adults, and all individuals in everything that TLM does.
- Ensure that, whenever possible, **there is more than one adult present** during activities with children/ vulnerable adults, or they are at least within sight or hearing of others – unless the reason for this has been firmly established and agreed with a manager overseeing TLM's activities.
- **Develop and maintain clear personal and professional boundaries and rules**, to keep both **beneficiaries** and **myself** safe.
- **Ensure the appropriate supervision and support** is in place to create a safe environment.
- Obtain **informed consent** from individuals and parents or caregivers for all TLM activities.
- **Abstain from developing intimate/sexual relationship with beneficiaries**, as these are likely to exploit unequal power relations and may undermine the integrity of TLM's work and create a real or perceived conflict of interest.

<sup>1</sup> <https://interagencystandingcommittee.org/inter-agency-standing-committee/iasc-six-core-principles-relating-sexual-exploitation-and-abuse> (Amended in Sept, 2019)

- **Promote inclusion by using culturally appropriate materials in accessible language**, and activities which provide alternatives for those who have special needs e.g. physical access, Braille, Auslan, dietary.

***I will NEVER:***

- **Engage in sexual activity** or any form of exploitation with children/vulnerable adults. This includes not marrying a person under the age of 18. Mistaken belief in the age of a child is not a defence.
- **Engage in or attempt to engage in sexual or inappropriate relationships** with children or vulnerable adults, including the use of suggestive conversations, comments, texting, instant messaging, emails, or via social media platforms, as there is an inherently unequal power dynamic.
- Communicate with children or vulnerable adults **via social media, emails, or phone unless it is as an agreed part of my work** and TLM managers are both informed and able to monitor activity.
- **Invite unaccompanied children or vulnerable adults into private residences**, unless they are at immediate risk of injury or in physical danger. If that is the case, I will immediately inform a TLM manager of the location and the reasons for this action.
- **Sleep in the same room with** children or vulnerable adults (noting that this does not apply to my own children, nor does it apply to my spouse if they are a vulnerable adult).
- **Engage in any commercially exploitative activities with children, vulnerable adults or any individual**, including child labour (e.g. domestic servitude<sup>2</sup>, street begging, trafficking, or modern slavery (as defined in Annex A of the Safeguarding Procedures)).
- **Use physical punishment** on children or vulnerable adults, nor use any form of corporal punishment as a disciplinary measure, (regardless of social norms) or withhold food, water, or other necessities of care.
- **Hire children or vulnerable adults for domestic or other labour**, which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of harm.
- **Develop any 'special' or exclusive relationships** with children or vulnerable adults that could be perceived as favouritism (for example, the offering of gifts or special treatment).
- **Neglect a child** or leave a child or vulnerable adult unsupervised that may put them at risk of harm or injury.
- **Carry out traditional practices that are harmful** (such as early or forced marriage, female genital cutting, honour killing etc.) of a child or vulnerable adult.

### **C - Reporting and Supporting Safeguarding Concerns**

***I will:***

- **Report all concerns** regarding inappropriate behaviour as soon as possible in accordance with the reporting mechanisms in the TLMA Safeguarding Policy and TLMA Children & Vulnerable Adults Policy and Procedures.
- **Co-operate** with all investigations into safeguarding matters and adhere to the duty to tell the truth.

### **D - Images and Personal Information**

If my role requires me to take or use images of beneficiaries.

***I will:***

- **Comply with TLM's Data Protection Policy, Safeguarding Policy and procedures** and all related national laws.
- **Ensure local traditions or restrictions** for reproducing personal images are adhered to before photographing or filming a child or vulnerable adult.

<sup>2</sup> Child Domestic servitude' does not include occasional house help, babysitting, kitchen gardening during school holidays or general domestic tasks out of school time.

- **Obtain written 'Informed Consent'** from any individual, and in the case of children from their parent/guardian, before photographing or filming. 'Informed consent' is with a reasonable knowledge of where and how their images may be used, the potential risks and consequences involved, and the provided option to opt out.
- **Ensure all** imagery and personal information presents children/vulnerable adults in a **dignified and respectful manner** where their privacy and dignity are maintained.
- **Ensure** that all individuals are **adequately clothed and not posing in a sexually suggestive or submissive way**.
- **Ensure images** are **honest representations of the context** without reinforcing stereotypes.
- **Ensure** file labels, metadata or text descriptions **do not reveal personal identifying information (PII)** when sending images electronically or publishing images and are in accordance with the **informed consent** processes. For images submitted to Resource Space please follow ResourceSpace guidance.
- **Store** images and personal information **securely in password protected TLM files**.

## E- General Conduct

### *I will:*

- Treat all individuals with **respect and never discriminate** against or favour any individual on the grounds of age, gender, status, class, caste, nationality, ethnic or social origin, faith, visual appearance, language ability, sexual orientation, disability.
- **Only share confidential information linked to concerns raised** through formal safeguarding reporting processes on a 'need to know' basis.
- **Read and consider the relevant risk assessment and risk mitigation plan** related to the project, programme or activity I am working on to ensure a safe and conducive environment is provided for all involved.
- **Fully abide with the requirements of the TLMA Bullying and Harassment Guidelines.**

### *I will NEVER:*

- Use my status or position to knowingly abuse, **intimidate, bully, harass, threaten, discriminate against, embarrass, shame, humiliate, coerce, use physical punishment or undermine** any individual, **recognising the power imbalance** that exists between TLM staff/representatives and beneficiaries.
- Engage in any exploitive, abusive, or corrupt relationships and **will take appropriate action if I become aware of them.**
- **Exchange of money, job, goods, services, incentives, or aid for sex**, including sexual favours or other forms of humiliating, degrading, or exploitive behaviour.
- **View, possess or distribute indecent images** of children, vulnerable adults, or any individual.
- **Work under the influence of alcohol** or use, or be in possession of, **illegal substances.**
- Encourage or assist any individual to **break the law** in any way.
- **Misappropriate goods intended for beneficiaries or any others for my own purposes.**
- **Misuse my power, privilege, or authority** over anyone to make them feel unsafe.
- **Take any bribes or rewards in order to cover up or ignore suspicious activity** involving anyone.

## Commitment

I have read, understood, and agree to abide by TLM's Safeguarding Policy, Code of Conduct, and associated procedures. I agree with the terms contained herein and accept the importance of complying with these provisions while working with or representing TLM and its partners in any way. I understand that I may face disciplinary action and possible criminal prosecution in the case of some of the above if I do not follow these provisions.

If any of my circumstances change that might affect my ability to undertake my duties within TLM and that may create a possible risk to children, vulnerable adults or others, I undertake to inform TLM's Designated Safeguarding Lead in-country or TLM's Global Designated Safeguarding Officer immediately and seek their guidance.

By acknowledging this code of conduct, I am agreeing with this commitment.