

Aktion Børnehjælp / Action Child Aid Code of Conduct

Introduction

Action Child Aid's (ACA) Code of Conduct constitutes our principles, guidelines and practises for all activities of the organisation, both in Denmark and in collaboration with our local partnering organisations. It applies to all staff, volunteers, board members and partners representing the organisation. While roles and contexts may differ, all individuals are expected to uphold the same standards when representing the organisation – whether in daily work, at events, or when implementing activities with local communities. We base our Code of Conduct on our key values of accountability, transparency, persistence and solution-oriented efforts, voluntariness, and diversity and inclusion.

Our Code of Conduct encompasses guidelines regarding both ethical and practical matters of all ACA's practises, and provides a common ground for our employees, volunteers, members, and partners, to achieve our objectives:

... to **improve conditions** for children and young adults in developing countries – educationally, health-wise, socially and in other ways. By providing help for self-help, with a specific focus on India.

... to **spread awareness** of the living conditions of children and young adults - including the rights of the child. This both in the project areas and in Denmark.

The Code of Conduct is formulated based on the behaviour we wish to promote and exhibit. Actions or behaviours violating these are perceived as breaches. The Code of Conduct includes sections regarding our **policies and approaches to Child Protection, Preventing Sexual Harassment, Exploitation and Abuse, Anti-Corruption** and finally **Anti-Terror**. Each section states the scope of the individual policy, how we enforce the policy as well as how to act and who to report to, in case of experiencing, witnessing or suspecting breaches.

Breaches or violations of this Code of Conduct will be handled by the board of ACA and/or the program manager and will be met with reactions corresponding to the nature, scope and severity of the breach or violation - ranging from recommendations and requirements to actual sanctions: conversation, warning/notification, termination of cooperation, and reporting to authorities.

Means of reporting:

Concerns should primarily be reported to the Safeguarding Focal Point (as stated on our webpage).

If the concern relates to the Safeguarding Focal Point, or if the complainant does not feel comfortable reporting to them, concerns can be reported directly to the Chairperson of the Board.

The Safeguarding focal point is responsible for receiving and initially assessing complaints.

Less serious matters may be handled internally. In more serious cases, or where needed to ensure neutrality, the Chairperson or a designated board member will be involved in the review and decision-making process.

All reports will be handled confidentially, and no individual will be subject to negative consequences for reporting concerns in good faith

To handle complaints, reports, and any irregularities, we employ a set of guiding principles in our decision-making:

- **Transparency:** as soon as irregularities are observed the employees or volunteers in ACA as well as in our partnering organisations are expected to act and report this. We expect our employees, volunteers and partnering organisations to uphold transparent communication.
- **Due diligence:** before taking any actions, the case/problem should be identified and defined, and information about the contexts, previous experience and current strategy should be gathered and analysed. This will guide the decision-making and actions. Those involved in the decisions should actively participate and support the actions.
- **Timely action:** should be taken within a timeframe of three months from the time of reporting. The actions will depend on the character of the specific case.
- **Do no harm:** meaning that the decision should not negatively affect, cause damage or loss to the parties involved nor to any of ACA's other members, employees or partnering organisations.
- **Agency:** decisions should leave the highest level of agency and freedom of action to the parties involved.
- **Evaluation:** actions and outcomes should be evaluated and help guide future decision-making.

Our values and principles

We base our Code of Conduct on the key values along with our compliance with the Universal Declaration of Human Rights, the Convention on the Rights of the Child, UN Sustainable Development Goals and finally Ministry of Foreign Affairs (MoFA) of Denmark – DANIDA Aid Management Guidelines.

Accountability, meaning clear roles and responsibilities, and encouraging responsible action both in India and Denmark, particularly in relation to people and purpose. We work under the principle of 'do no harm'. We expect all parties to take responsibility for their actions.

Transparency across all levels of the organisation and as a key value in our partnerships. Transparency to us means honest and open communication between all parties.

Persistence and solution-oriented efforts to protect and strengthen our members, partnering organisations and communities. Efforts should always be made with proper due diligence.

Voluntariness and participation to help drive the behavioural- and social change, as we believe that change should start from the community.

Diversity and inclusion ensuring that no person is excluded or treated differently based on their age, ability, caste, ethnicity, race, gender, sexual orientation, socioeconomic status, and/or religion.

Equal and respectful partnerships guiding our collaboration in Denmark and India. We strive to build relationships based on mutual respect, trust, and shared responsibility, where all parties are valued equally.

As an organisation, we manage funds from both private donors, private corporations, as well as public and governmental funds. We ascribe to ISOBRO's ethical guidelines for fundraising. We strive to utilise and manage the funds in a way that helps meet our objectives in a sustainable way, as well as with respect for our contributors. We do this by communicating truthfully and trustworthily about our ac-

tivities, as well as practising openness and transparency about the organization's purpose, management, and finances. Furthermore, we adhere to the current GDPR regulations and guidelines in order to protect our contributors, members and partners.

During partnerships with private corporations we will help and guide partners to communicate correctly about the partnership and the results, to avoid green washing and secure transparency and honesty. Corporate partners can also never influence our partnerships with local Indian partners or our strategic framework.

Respectful communication includes portraying families and children who are a part of our projects, based on the following principles:

- We will not show naked people, nor children. Bare bellies on children under teenage years are acceptable.
- We will change the names of individuals appearing in cases, unless they are permanently affiliated with (e.g., employed by) our local partners.
- We will not use images or material that portray people in degrading situations or under wretched conditions. For example, children with flies on their faces, crying, or emaciated bodies.

At times we communicate with children in Denmark during events. Therefore we are aware that the events are focussed around spreading awareness, knowledge and creating engagement among children, and not to fundraise. Elements of fundraising or collections are always directed towards parents, and creating in an open and transparent way, where no one is asked to donate to participate. Pictures from these events will be used for communication materials, but faces of participating children will be covered.

Child protection policy

The key objective of ACA's interventions primarily focuses on improving conditions for children and young adults. We strive to do this by acknowledging children and young adults as agents in their own lives. At the same time, we must always protect the children, thus, it is important to support creating child-friendly- and safe environments, by using interactive methods, spreading knowledge and awareness and engaging with relevant stakeholders not least the parents.

We do this by adopting UNICEF's 7 principles for a rights-based approach:

- **Dignity:** staff should have the skills required to interact with children and ensure that children are part of the conversation. This includes listening and responding to the children and knowing relevant and inclusive methods.
- **Interdependence:** the rights of the child weigh equally, thus addressing one right should not lead to breaching another. The interventions should hence be holistic.
- **Best interest:** of the children should be included when designing and implementing interventions.
- **Participation:** the children should be part of the interventions and should be encouraged to have a say in matters, which concern them.
- **Non-discriminatory:** protecting children against discrimination on their age, ability, caste, ethnicity, race, gender, sexual orientation, socioeconomic status, and/or religion.
- **Transparency and accountability:** establishing strong and trusting relations between the children and young adults and stakeholders, whether that being professionals, politicians,

parents etc., based on open communication and dialogue, using methods which are inclusive towards the children.

- **Life, survival and development:** we should empower and encourage the growth of children and help secure a safe space. No employee or volunteer should participate in behaviour that is illegal, unsafe or abusive to children and young adults. Neither should they develop inappropriate relationships with children or young adults, including relationships that show favouritism, nor display violent or inappropriate behaviour towards a child or young adult.

Furthermore, part of our interventions should always focus on eradicating child labour – directly or indirectly by supporting marginalised households. This is done by supporting and spreading awareness about already existing local legislation and initiatives. Hence, we fully support The Danish MoFA clause against child labour:

“The Implementing Partner shall abide by applicable national laws as well as applicable international instruments, including the UN Convention on the Rights of the Child and International Labour Organisation conventions. Any violation will be ground for immediate termination of the Agreement.”

Actions in case of breaches:

If an employee or volunteer experiences, witness or suspects breaches or poor safeguarding of the policy to protect the child, whether it being in one’s team, in the implementation areas, or in the organisation, (s)he should:

- Act in the best interest of the child or young adult at all times
- Take immediate action to ensure the safety of the child or young adult
- Report the concern promptly
- If in Denmark: Promptly report the case to the safeguarding focal point, who will initiate the relevant procedures based on the character of the breach. All reports will be kept confidential. However, the ‘reporter’ is expected to collaborate in the investigation of the case.
- If in India: We expect all our partnering organisations and members of these, to promptly contact the relevant management to initiate internal processes. here appropriate, the Programme Manager at ACA must also be informed. The Programme Manager will assess whether further action is required. All reports will be kept confidential.

In all cases, potential conflicts of interest must be avoided.

When a case has been reported, the nature of the breach will be assessed and further investigation processes will be initiated accordingly. We strive to respond promptly, with the primary objective of protecting the child(ren).

Safeguarding Preventing Sexual Harassment Exploitation and Abuse

ACA ascribes to DANIDA’s clause on Preventing Sexual Harassment, Exploitation and Abuse (PSHEA):

“The Danish MoFA has a zero tolerance for inaction approach to tackling sexual exploitation, abuse and harassment (SEAH2) as defined in UNSG Bulletin ST/SGB/2003/13 and the definition of sexual harassment in UNGA Resolution A/RES/73/148. The Implementing Partner, and its sub-grantees, will take appropriate measures to protect people, including beneficiaries and staff, from SEAH conducted by its employees and associated personnel including any sub-grantee staff and take timely and appropriate action when reports of SEAH arise. In the event that the Implementing Partner receives reports of allegations of SEAH, the Implementing Partner will take timely and appropriate action to investigate the allegation and, where warranted, take disciplinary measures or civil and/or criminal action. Any violation of this clause will be ground for the immediate termination of the Agreement.”

Our safeguarding mechanisms are to ensure that neither of the following takes place and that we have a clear procedure for notification and reactions to cases concerning sexual harassment, sexual exploitation, and sexual abuse. We do not tolerate abuse of power and/or privilege in any form towards any person being children, adolescents, or adults.

We adopt the UN definitions of:

- **Sexual harassment** includes any unwelcome conduct that may reasonably be expected or perceived to cause offence or humiliation. It may take the form of words, gestures or actions that intimidate, demean which tend to annoy, alarm, abuse, demean, intimidate, belittle, humiliate or embarrass another. Or which creates an intimidating, hostile or offensive environment.
- **Sexual exploitation** includes any actual or attempted abuse of positions of vulnerability, power or trust for sexual purposes. Exploitation occurs when one party is benefitting from the arrangement or situation, asking for sexual favours in exchange for goods, services or benefits is a form of sexual exploitation
- **Sexual abuse** includes actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or forced conditions.

We aim to prevent any such cases through:

- **Awareness and culture:** ensuring that all employees and volunteers in ACA as well as our partnering organisations, are aware of our Code of Conduct and our zero tolerance towards any sort of abuse of power, and the consequences of breaches or violations. Furthermore, it is important that all employees and volunteers know about and respect different individuals' boundaries.
- **Reporting:** it should be easy and safe to report both as sufferer, survivor or as one who has witnessed any form of abuse of power. It is important to stress, that cases which are not current, will also be taken seriously. We acknowledge that someone who has suffered or survived abuse of power, may not be able to react or are not aware of the level of abuse, until after the events.
- **Reacting:** we emphasize having a quick response to any report and engaging in the investigation of the case. All reports should be taken seriously, and appropriate procedures should be initiated. Reactions and investigations should prioritise protecting those who are/have been affected by the abuse of power, providing them with the safe space to share their experience and support their need.

Actions in case of breaches:

Any employee, volunteer or beneficiary who experiences, witnesses or suspects any disrespectful or transgressive behaviour, towards any employee, member, local partner or beneficiary, whether it being in Denmark or India should promptly report to the safeguarding focal point, who will initiate the relevant procedures. Report can be given by email, phone or in person. All reports will be kept confidential. No individual will face negative consequences for reporting concerns in good faith.

When a case has been reported to the safeguarding focal point will assess the nature of the breach and proceed accordingly and further investigate the case. We strive to react promptly with the primary objective of protecting and supporting the person affected. It is important for us to reestablish a safe space for all members and partnering organisations of ACA. Where necessary, further investigation will be carried out, and appropriate action taken to ensure a safe environment for all involved.

Anticorruption and irregularities

Acts of corruption go against our main objectives, as it, in the words of Transparency International: *erodes trust, weakens democracy, hampers economic development and further exacerbates inequality, poverty, social division and the environmental crisis*. We perceive corruption as stealing the future of children and young adults. Hence, ACA does not tolerate any employee, volunteer or partner within or in connection to the organisation or in our partnering organisations to engage in any form of corruption – the abuse of entrusted power for private gain. This includes, but does not limit to Transparency International's and Cambridge Dictionary's definitions of:

- **Bribery:** any attempt to make someone do something by giving the person money, presents, or something else that they want.
- **Conflict of interests:** an entrusted person choosing between the duties and demands of their position and their own private interests.
- **Extortion:** utilising, either directly or indirectly, one's access to a position of power or knowledge to demand unmerited cooperation or compensation as a result of coercive threats.
- **Facilitation payments:** A small bribe, also called a 'facilitating', 'speed' or 'grease' payment; made to secure or expedite the performance of a routine or necessary action to which the payer has legal or other entitlement.
- **Fraud:** To cheat. The offence of intentionally deceiving someone in order to gain an unfair or illegal advantage (financial, political or otherwise). E.g. manipulating bills and vouchers and/or fraudulent billing, fraud in tax payments, salaries, pensions.
- **Nepotism:** a form of favouritism based on acquaintances and familiar relationships whereby someone in an official position exploits his or her power and authority to provide a job or favour to a family member or friend, even though he or she may not be qualified or deserving

Hence, ACA follows the Danish MoFA clause on anti-corruption:

"No offer, payment, consideration or benefit of any kind, which could be regarded as an illegal or corrupt practice, shall be made - neither directly nor indirectly - as an inducement or reward in relation to tendering, award of the contract, or execution of the contract. Any such practice will be grounds for the immediate cancellation of this contract and for such additional action, civil and/or criminal, as may be appropriate. At the discretion of the Danish Ministry of Foreign Affairs, a further consequence of any such practice can be the definite exclusion from any tendering for projects, funded by the Danish Ministry of Foreign Affairs."

We employ the following mechanisms to prevent and detect any type of corruption:

- **Motivation:** All employees and volunteers are expected to act with integrity and avoid situations which could motivate to any form of corruption for him/herself and for any person (s)he interacts with.
- **Possibility:** having clear and transparent procedures and being aware of irregularities.
 - All partner organisations should respect national CSO regulations e.g. registration and presentation of accounts.
 - We have and expect all our partnering organisations to have internal structures including:
 - Clear separation of functions with internal control mechanisms.
 - Documented workflows.

- Specific procedures in regard to **budgeting** and changes in project- and organisational budgets, **accounting and bookkeeping** including supporting documents such as bills and vouchers, as well as **balancing accounts** and writing **financial reports**.
 - Financial reports and supporting documentation will be checked frequently and any irregularities will be investigated.
 - **Rationale:** we do not tolerate any form of corruption, and concerns will be taken very seriously, and proven corruption will lead to actual sanctions.

Actions

In case of reasonable suspicion ACA is obliged to involve our donors in the investigation and proceedings. If any employee or volunteer, or external stakeholder experiences, witness or suspects breaches of our anticorruption policy, this should promptly be reported to the safeguarding focal point, who will initiate the appropriate procedures. All reports will be handled confidentially. No individual will face negative consequences for reporting concerns in good faith. However, the 'reporter' is expected to collaborate and help providing concrete evidence in the investigation of the case.

Anti-terror

ACA adopts and ascribe to Danish MoFA's clause on anti-terror and agree to ensure that:

"If, during the course of implementation of this Project/Programme, the Implementing Partner discovers any link whatsoever with any organization or individual associated with terrorism, it must inform the Danish MoFA immediately and explain the reasons for such transfer, including whether it was made or provided knowingly, voluntarily, accidentally, unintentionally, incidentally or by force. The Implementing Partner agrees that it and/or its implementing partners (including contractors, sub-contractors and sub-grantees) will take all reasonable steps to secure that no transaction made in relation to the Project/Programme will – directly or indirectly – benefit a person, group or entity subject to restrictive measures (sanctions) by the UN or the EU. Any violation of this clause is ground for immediate termination of the Agreement returning to the Danish MoFA of all funds advanced to the Implementing Partner under it."

Security (security principles and travel security, etc.)

To ensure safe and secure travels to monitor projects and partnerships in India, ACA has a description of the security planning of - and preparedness for - missions abroad carried out by employees, the board of directors and volunteers of ACA.

Before travelling

Formulating Terms of Reference for the travel

As part of the preparations, a Terms of Reference (ToR) with clear objectives and plans for the visit should be made. As part of the ToR the security of the areas which are to be visited should be assessed. The assessment is based on MoFA's current assessment as well as observations and recommendations from the local partner. If either of the two does not consider the travel to be safe, that being for both the travellers from ACA and representatives from the partner, it should be reconsidered and potentially rescheduled. Furthermore, travel is only done if ACA's insurance company is willing to cover it.

The employee or volunteer always has the right, in dialogue with management, to say no if there are safety issues or risks that are assessed by the individual to be too difficult to handle, no matter how far in the planning of the travel they are. The employee or volunteer further has the right to keep the reason(s) private.

All travellers are expected to follow recommendations from the State Serum Institute regarding vaccinations and preventive medicine. If there are special health conditions that prevent it, this must be reported to the management, which assesses whether it is appropriate for the traveller to make the travel in question. The responsibility for preventive medicine and vaccinations rests with the traveller at all times.

Based on the analysis and the purpose of the trip, the following are included in the ToR of the travel:

- Selection of specific destinations also locally, and timeline (considering seasons, cultural/religious festivals) along with any specific risks and recommendations.
- Choice of safe means of transport, where security is weighted over price.
When travelling by car the driver should drive a maximum of 5 hours coherent driving. In case of longer trips, a break of 45 minutes should be scheduled every 5th hour.
When travelling by bus or train a representative from the partner organisation should accompany the travellers and should also arrange ordering of tickets.
- Means of communication, including considerations regarding connection to and from the destination (e.g. is it possible to call out, receive calls and send and receive text messages), access to internet connection, and a discussion of whether to “check-in” at restaurants and locations, revealing the travellers’ position.
- Choice of accommodation (usually mid-range hotels and the like or at the partner's campus). When choosing accommodation, the partner can be consulted and should be informed of the budget of the present travel. When visiting remote project areas, representatives from the partner should find the most suitable accommodation, and at least one representative from the partner organisation should be staying at the same accommodation.
- Description of risk of health and access to help in case of illness.
- Clear statement of the insurance, what it covers and how to contact the insurance company.
- How payments are done during the travel and a clear statement of what is covered by ACA and what is a personal expense.

Preparations

Prior to the travel, all travellers meet to discuss the ToR and fill and sign [traveling contracts](#), which state the formalities of the travel: destination, duration, tasks and responsibilities, any important information about the travellers, such as chronic illness or the like, as well as contact information of relatives.

Furthermore, the following should be done:

- Ensure that passports are valid and apply for visa
- Vaccinations based on SSI recommendations for business travels
- Purchase of - and possibly preventive treatment with - necessary medicine
- Registration for the Danish List via the Ministry of Foreign Affairs' travel app "Rejseklar"
- Agree on communication flows between the travellers and ACA's office and/or board
- Planning pick-up by the partners
- Prepare document with contact to
 - Insurance company
 - Who to contact in Denmark
 - Danish Embassy in India
 - MoFA globale vagtcenter

While travelling

The traveller is obliged to follow the agreements and instructions given, comply with local laws and regulations and generally behave sensibly in relation to their own and others (for example, fellow travellers and local hosts') safety.

The traveller is entitled to object at any time if situations arise or activities and places with security challenges are planned that (s)he deems to be too difficult to handle.

If incidents occur that directly or indirectly have significant consequences for the traveller's security, health, safety or valuables, representatives from ACA, depending on the present ToR, must be informed as soon as possible.

If there are incidents that trigger the need for support from health authorities, police and authorities in general or the traveller otherwise needs urgent help, ACA's insurance company is contacted - and their guidelines must be followed. As soon as possible representatives from ACA should be informed.

After travelling

After travel, a monitoring report should be compiled, including a brief description of the activities as well as reflections on any attention points or safety considerations, risks or incidents on the trip that can be included as context and learning for other travellers both in general and in relation to the specific destination.

No later than 14 days after returning the travellers should hold a debriefing meeting. Information involving personal matters should be provided separately to the safeguarding focal point.

Procedure for updating our Code of Conduct

The most current version of the Code of Conduct will at all times be available at ACA 's webpage: <https://www.aktionboernehjelp.dk/> and will be shared with members and partners of ACA.

All members of ACA are obliged to adhere to this Code of Conduct. All members are equally encouraged to suggest adjustments and contribute to its ongoing development. The Programme Manager is responsible for reviewing and, if necessary, revising the Code of Conduct.

The Code of Conduct is reviewed every two years, and updated as needed to ensure that practises remain aligned with the policies and relevant to the current context.

The present Code of Conduct has been approved and adopted by the board on:

Date: 10.06.2026