



Code of Conduct for all employees of PMU¹

Adopted by PMU's management team on March, 2020

Introduction

At PMU we are all responsible for upholding and encouraging an ethical and professional standard of behaviour. We respect the foundational values of the organization² and the people we meet in the line of our work for PMU.

Purpose

The Code of Conduct describes the responsibility of PMU management and staff, as employees of Pingst³/PMU. The purpose of the Code of Conduct is to give guidance in and encourage an increased ethical responsibility in our work, as well as towards churches, international partners and the people with whom PMU cooperates. Its purpose is also to give tools regarding how to report any lack of compliance with the Code. Based on the commitment of PMU to prevent fraud, corruption⁴ and abuse of power as well as sexual exploitation and harassment, the Code of Conduct seeks to protect both staff and people with whom PMU cooperates.

Scope

The Code of Conduct applies to all personnel within PMU, at the head office and the regional offices, as well as during travels on behalf of PMU. During travels, PMU staff are representatives of PMU and must respect the Code of Conduct during both work hours and leisure, as well as when being active in official channels of communication, including social media. In regards to employees stationed abroad, their family members should be well acquainted with the Code of Conduct and its content. The Code also applies to consultants, trainees/interns and volunteers performing work for PMU in Sweden and abroad, as well as members of Board and Steering Committees of Pingst FFS when they are representing PMU.

Employees of local partners, as well as representatives of Swedish churches, represent PMU only if there has been a clear agreement to this effect for a specific mission.

¹ Besides this document PMU HQ staff is also obliged to follow the guidelines in the *Pingst FFS staff handbook* regarding discrimination, bullying, working environment, equality and equal treatment, anti-corruption, employment termination due to personal reasons, and employment termination by the employer. PMU Regional Office staff will be informed which staff guidelines to be followed besides this document.

² According to the most recent version of Project Manual of PMU, chapter 1

³ Pingst FFS is the legal entity that PMU is a part of

⁴ Including PMU Project manual annex 1.9 Policy for anti-corruption

Basis for, and compliance with, the Code of Conduct

The management of PMU is responsible for informing staff about this Code of Conduct, but it is the responsibility of each member of staff to read, understand and comply with the contents of the Code. If any member of staff is uncertain as to the meaning of the contents of the Code, this member should discuss it with their immediate superior. It is essential that our commitment to human rights, non-discrimination and the humanitarian principles of humanity, neutrality, impartiality and independence is supported and demonstrated by all members of staff, volunteers and other representatives. The Code of Conduct applies until further notice.

The Code of Conduct is part of PMU's contract of employment and the Pingst Handbook for staff stationed abroad. The Code of Conduct is published on PMU's website: <https://pmu.se/en/for-partners/> and then click *Policies*.

The Code of Conduct covers the following four areas, which are described in more detail below:

1. Integrity and responsibility
2. Inappropriate behaviour
3. Disciplinary measures
4. Reporting and complaints

1. Integrity and responsibility

The work and reputation of PMU in regards to all its areas of operation rely greatly on the efforts and behaviour of its staff. The behaviour of a member of staff towards others should be based on respect and a promotion of human rights.

Members of staff are often seen to have a privileged position and those with whom PMU cooperates may see themselves in a dependent role with regards to PMU staff. We must be aware of this and take this into consideration in our work and our meetings with others.

PMU staff is obliged to create and maintain an environment which promotes the implementation of this code of conduct, and prevents inappropriate behaviour including sexual exploitation and abuse. The PMU managers at all levels have particular responsibilities to support and develop systems which maintain this environment.

Members of staff are also representatives of the Swedish Pentecostal Movement.

2. Inappropriate behaviour

PMU will regard the unacceptable acts described below as misconduct or gross negligence. Generally, all forms of abuse of power will be considered as gross misconduct.

2.1 Violation of laws, rules and regulations

- Violation of applicable Swedish, national/international laws or other agreements.
- Non-compliance with PMU policies and guidelines.⁵

⁵ Policies and guidelines: (Applicable policies and guidelines are found on <https://pmu.se/en/for-partners/> and then click *Policies* and also *Anti-Corruption and Complaints*.)

2.2 Abuse of power

Abuse of power is defined as violations, abuse of position or influence as well as decision making for personal gain, or that of another person. Abuse of power includes e.g. favouritism⁶, nepotism⁷, corruption⁸, bribes and all other forms of exploitation, also sexual exploitation.

PMU practices a zero tolerance approach regarding abuse of power, as well as any type of unethical behaviour such as forced and child labour, modern slavery, illegal employment and intentional environmental damage. Such acts will be dealt with in accordance with what is outlined under heading 3: *Disciplinary actions and consequences*. The following acts are categorized as abuse of power:

- Any act that can be considered as harassment, bullying, discrimination, racism or an illegitimate use of authority.
- Any arbitrary conduct making PMU legally, economically or morally responsible.
- Theft, embezzlement of funds or unauthorized use of PMU property or staff.
- Any discrimination or unequal treatment, when the disadvantaging is associated with e.g. gender, culture and ethnicity, religion or other belief, disability, sexuality or age.
- All forms of exploitation and assault, including sexual exploitation, abuse and harassment according to the definition of *United Nation's Secretary General's Bulletin on Special Measures for protection from Sexual Exploitation and Sexual Abuses (ST/SGB/2003/13)*, *IASC/PSEA WG updated commitments*⁹ and *CHS commitments*¹⁰.
- Compensation in the form of money, labour, products or services for sexual or in other ways humiliating, degrading or exploitative acts. PMU considers the purchase of sexual services as a form of exploitation and it is therefore treated as a gross abuse of power, including exploiting the vulnerability of any staff, partners, contractors or beneficiary group, especially women and minors. Also, read Annex to PMU Code of Conduct regarding Child Safeguarding, attached to this document.
- Any sexual relationship between those providing assistance and protection and a person benefitting from such assistance and protection that involves improper use of rank or position is prohibited.

2.3 Disregarding security measures

- Non-compliance with security measures mandated by PMU and possibly also those of local partners.
See further: *Emergency Preparedness and Safety*.
- Use or possession of weapons or ammunition of any kind while in service.
- Use of narcotics and other illegal substances.

2.4 Wrongful representation

- Making public statements of a political or military nature in the name of the organization.
- Handing over evidence or information or witnessing in a court of law, without prior consent from the director of PMU¹¹.
- Wrongful use of the PMU logo. See policy regarding PMU Logo.
- Publishing documents, articles or research findings related to a cooperation partner or project without prior consent from the director of PMU.

⁶ This is a mechanism of power abuse ("privatisation") and is defined as a strongly biased allocation of common resources, regardless of how these resources were originally collected.

⁷ Leaders and members of staff who give preferential treatment to their own friends and family members, regardless of their qualifications and without any judicial proceedings.

⁸ By corruption, PMU refers to the abuse, by individuals or groups, of entrusted power or position for undue gain. Corruption is a complex issue that includes bribes, embezzlement, fraud, partiality, nepotism, swindle or extortion.

⁹ UN Inter-Agency Standing Committee/Working Group for PSEA

¹⁰ <https://corehumanitarianstandard.org/the-standard>

¹¹ In the event of a person being obligated by law to give evidence or other information, this person must immediately inform the Director of the organization.

- Actions or neglect that could discredit PMU. *NB, this does not apply to actions of alerting relevant authorities to gross negligence or wrongful actions of PMU as an organization.*
- Failure to show respect for customs, habits or religious convictions.
- Accepting or performing tasks or services that may enter into conflict with ordinary service to PMU without prior consent from the director of PMU.
- The use of alcohol while in service. In case of service abroad, this applies also outside of working hours, as it does for those who are travelling as part of their service.

2.5 Negligence or theft

- Negligent handling of PMU property, including negligence at preparation and accounting of PMU funds.
- Theft of any kind.

2.6 Defamation or distortion

Making any form of deliberately false or malevolent statement, or false accusation of another member of staff or a third party.

2.7 Corrupt behaviour

Corrupt behaviour in this context is when a PMU representative is obtaining improper gains by the position within PMU and thereby causing damage or loss. It includes kickbacks and bribery, extortion, favouritism and nepotism, and also embezzlement, racketeering, conflicts of interest and illegal financing of political parties. Some examples:

- Neglecting to inform about, or show full transparency regarding a potential conflict of interest in relation to a supplier, or business partner (including close family ties, shareholding or similar).
- Handling or making decisions on an issue that concerns yourself or a close relative, or partially favouring a person or a group.
- Receiving or giving personal gifts which could be regarded as a bribe. A gift given according to local custom can normally be received and considered a gift to PMU.

2.8 Confidentiality

To reveal confidential information that was received while a PMU employee. The IT policy¹² of Pingst must be complied with, as well as guidelines concerning the handling of personal data according EU-GDPR-regulation.¹³

2.9 Social media

The manner in which social media is used or handled must not be in conflict with the values of PMU and its Code of Conduct, even if it is done in the sphere of private life, since this may affect the image of PMU as an organization. In regards to the safety of our local cooperation partners, special caution must be observed, also in order to reduce traceability via social media.¹⁴ Also, read *Annex to PMU Code of Conduct regarding Use of Children's Images and Interviews with Children* attached to this document.

¹² See documents in Sharepoint/PMUAllmänt/Dokument/General/CoC

¹³ See documents in Sharepoint/PMUAllmänt/Dokument/General/CoC

¹⁴ Also, see PMU's general policy regarding press and social media

3. Disciplinary measures

Procedural measures

In cases where there is a substantiated suspicion of wrongdoing by a member of staff, the director of PMU may take the employee out of service, retaining full pay, until further decision has been made on this matter. The director of PMU must ensure that the head of the concerned department initiates relevant inquiries and measures as soon as possible. In the event of non-compliance with this Code of Conduct, before any disciplinary action is taken, the member of staff is to receive a written statement of the suspicions and be given ten working days to respond to the allegations. This period can be extended to a month, subject to a written request.

Possible consequences for members of staff

Non-compliance with the Code of Conduct may lead to disciplinary and/or legal consequences and ultimately to the termination of the contract of employment.

Interns and other PMU representatives

In case of a substantiated suspicions of wrongdoings by representatives of PMU who are not members of staff, PMU may terminate the mission of the representatives after a consultation with the congregation in question, employer or similar authority, and will then give a full report to the party or parties representing the person concerned.

Request of compensation

PMU reserves the right to demand reasonable compensation for damage or costs associated with the non-compliance of the Code of Conduct by a member of staff, including, when applicable, the cost of the PMU employee's return trip to Sweden or place of residence.

Civil or criminal liability

Measures taken according to these disciplinary procedures do not preclude further administrative measures or liabilities under civil or criminal law.

4. Reporting and complaints

Reporting of suspicions

A member of staff who suspects non-compliance with the Code of Conduct is to report these suspicions as soon as possible to the head of department or to the director of PMU, if this is considered more appropriate. The right to anonymity is to be respected in regards to all parties and suspicions are to be reported only to a head of department or to the director. PMU has the obligation to protect the identity of the person reporting suspicions. If need be, the head of department or the director may be assisted by an HR officer and a union representative may assist the member of staff.

Where PMU staff develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in PMU or not, he or she must report such concerns via established agency reporting mechanisms.¹⁵

A member of staff reporting a matter where a head of department or senior member is involved, is to report this to the nearest head of the organization. A member of staff may also turn to an HR officer for

¹⁵ Issues regarding sexual exploitation of children, discrimination, bullying, working environment, equality and equal treatment, anti-corruption, employment termination due to personal reasons, and employment termination by the employer should be handled as described in the *Pingst FFS staff handbook* for staff working at PMU HQ. For PMU staff with its working place outside of PMU HQ all issues regarding grievance should be handled according to the PMU Grievance Procedure Policy.

advice and support. This also applies in case the member of staff feels that senior staff has not handled the matter in a correct manner.

Any member of staff who deliberately makes false accusations regarding another member of staff's non-compliance with the Code of Conduct may be subject to disciplinary measures after a decision by his or her employer.

Complaints Response Mechanism regarding non-compliance of the Code of Conduct

If Swedish partner churches, local cooperation partners or other cooperating organizations, donor organizations or individuals find that PMU staff do not comply with this Code of Conduct, they should report this to the director of PMU. Non-compliance with the Code of Conduct may also be reported anonymously via PMU's system for handling complaints, Complaints and Response Mechanism – CRM, which is published on PMU's website: <https://pmu.se/en/for-partners/> - and then click *Anti-Corruption and Complaints*.

Whistle-blowing and grievance procedure

We refer to the *PMU whistle-blowing policy*¹⁶ in case you as PMU staff want to raise concerns about misconduct within PMU or within an independent structure associated with PMU.

In case you want to raise personal issues relating to your specific job or employment or colleagues, we refer to the PMU grievance procedure and the two documents *PMU Grievance Procedure Policy* and *PMU Employee Grievance Form*¹⁷.

Child safeguarding

By signing the *Code of Conduct for all PMU employees* you are also endorsing the annexes attached to this document regarding *Child Safeguarding* and regarding *Use of Children's Images and Interviews with Children*.

Place and date

Name of employee

Signature

Signature of employer's representative

¹⁶ See documents in Sharepoint/PMU Allmänt/Dokument/General/CoC

¹⁷ See documents in Sharepoint/PMU Allmänt/Dokument/General/CoC

Annex to PMU Code of Conduct regarding Child Safeguarding

PMU believes that all children have the right to protection from all forms of violence, abuse and exploitation. In all our activities and relationships, PMU strongly rejects all forms of sexual exploitation of children. This applies both to work at home and abroad as well as to temporary business trips. Staff, volunteers, contractors and others representing or visiting PMU partner projects are responsible for maintaining a professional role with children, which means establishing and maintaining clear professional boundaries that serve to protect everyone from misunderstandings or a violation of the professional relationship. This Child Safeguarding Code of Conduct outlines the behaviour PMU expects from all staff and others associated with its members, with regards to working with or in the proximity of children.

I, agree to abide by the following behavioural guidelines concerning children I come into contact with through my work:

I will:

- Treat all children with respect, regardless of race, colour, sex, sexual identity, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status
- Conduct myself in a manner that is consistent with the values of PMU
- Provide a welcoming, inclusive and safe environment for all children
- Respect cultural differences which do not harm the child
- Encourage open communication between all children, young people, parents, staff and volunteers and enhance and promote the participation of children in the decisions that affect them
- Be transparent in my actions and whereabouts
- Take responsibility for ensuring I am accountable and transparent, and that I do not place myself in positions where there is a risk of allegations being made. Wherever possible, I will ensure that another adult is present when I am working in the proximity of children.
- Report any concerns of child abuse or policy non-compliance in accordance with PMU's reporting procedures
- Keep confidential all information that I am party to regarding child protection cases, disclosing and discussing information only with the relevant parties
- Report any concerns or suspicions regarding abuse or policy non-compliance by a fellow worker, volunteer, contractor or visitor, in line with PMU's reporting procedures
- Comply with all relevant national legislation, including labour laws in relation to child labour
- Immediately disclose all charges, convictions and other exploitation and abuse and policy non-compliance in accordance with appropriate procedures

I will not:

- Engage in behaviour that is intended to shame, humiliate, belittle or degrade children.
- Use inappropriate, offensive, harassing, abusive, sexually provocative, demeaning, culturally inappropriate or discriminatory language when speaking with a child
- Do things of a personal nature that a child can do for him/herself, such as assistance with toileting or changing clothes. If this is necessary, for example for a child with a disability, I will inform my supervisor first and be as open as possible in my behaviour, which includes explaining to a child what I can do to assist them

- Invite unaccompanied children into my home, unless they are at immediate risk of injury or in physical danger
- Sleep close to unsupervised children unless absolutely necessary, in which case I must obtain my supervisor's permission, and ensure that another adult is present if possible.
- Hit or physically assault children.
- Use physical punishment on children
- Develop sexual relationships with children or relationships with children that may be deemed exploitative or abusive.
- Engage in any form of sexual activity or acts, including paying for sexual services or acts, with anyone under the age of 18. Mistaken belief regarding the age of a child is not a defense.
- Visit bars, restaurants or similar where minors are sexually exposed. We report suspected cases of sex trafficking with children to the police.
- Encourage or condone behaviour on the part of others which constitutes abuse or exploitation of a child
- Behave provocatively or inappropriately with a child. Hold, kiss, cuddle or touch a child in an inappropriate, unnecessary or culturally insensitive way.
- Seek to make contact, in person, by phone, or electronically, and/or spend time with any child that I come into contact with in my role as a representative of my agency, outside of designated work and activity times of my role
- Discriminate against any children for any reason or show special favour towards any child or group of children
- Release or discuss any personal confidential information about suspected or proven child abuse or protection cases other than with the relevant persons.
- Use any computer, mobile phone, or video and digital camera to exploit or harass children. I will not access child pornography through any medium (see also *PMU's Guidelines Regarding Use of Children's Images and Interviews with Children* below)
- Hire children to perform domestic labour or any 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 injury or any other harm.

Annex to PMU Code of Conduct regarding Use of Children's Images and Interviews with Children

When photographing, filming or interviewing a child/children during work hours, I must:

- Portray all people with respect, and all material should show people's dignity and equal value.
- Obtain informed consent for each interview. If the interview is made with an individual under 18 years informed consent can be obtained directly from the parent/ guardian/ legal representative or alternatively by a local partner preparing the visit and interview and in this context having obtained informed consent.
- Introduce myself and explain the purpose of the visit and the communication is, before starting an interview, photograph or filming. The aim is that all individuals who participate in words, pictures or films should be well informed about how the material will be used.
- Assess and endeavour to comply with local traditions or restrictions for reproducing personal images.
- Ensure children are portrayed as part of their community.
- Ensure photographs or films used have a clear purpose and are not offensive. Communication as a whole should show hope and the individual's ability to change his or her own situation, if the right conditions and tools are provided, although needs and distress may be showed in individual images.

In the context of disaster situations, images of distress may be justified to a greater extent than otherwise, but make an even deeper consideration if it is right to publish the picture(s) in connection with pictures of individuals in extra-vulnerable situations.

- Ensure images are honest representations of the context and the facts. Consider both the context in which the child lives in, as well as the content of the picture, before PMU publishes a picture or movie of a child.
- Ensure that photographs and/or films present children in a dignified and respectful manner, not in a vulnerable or submissive manner. Children should be adequately clothed and not pose in a way that could be seen as sexually suggestive, children who make signs or using an inappropriate body language. If the situation makes, for example, undressed children or other individuals difficult to avoid, body parts can be blurred or otherwise treated with discretion.
- Ensure that interpretation is of such good quality that the message cannot be misinterpreted.
- Ensure file images do not reveal identifying information about a child when sending images electronically.
- Give the individual the right to be anonymous if he or she wishes. Especially children and survivors of sexual violence should be treated with extra care.
- Ensure there is as little identifying information as possible of the child used in the publication of images with their location. First names can be used, but only after the consent of the guardian and the child himself/herself. I will ensure all recorded identifying details are stored confidentially.
- Ensure all photographers I am supervising are screened for their suitability, including police checks where appropriate.
- Consider whether fingered names should be used in texts that interview or describe someone in an extra-vulnerable situation, such as survivors of sexual violence. If we fear that publication may pose risks to an individual, this applies even if the person has given his / her permission to use his / her real name.

- Let, as far as possible, someone affected i.e. the person interviewed, project staff or one of PMU's responsible officers, read the text and approve before publication.
- Not post images or details of children associated with PMU's work on personal social media sites, unless they are approved by PMU and in accordance with this guidelines.