



Civil Connections

Building robust communities

Policy & Leadership

**Civil Connections
Code of Conduct**

2025



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1. Introduction

This document – The Code of Conduct of Civil Connections – holds the values and rules that Civil Connections and its staff or any other person acting in the name of Civil Connections, shall act by to uphold and safeguard the necessary professional and ethical standards of conduct that are a precondition for safeguarding and protecting the rights, safety, and integrity of the different stakeholders we work with. At its core, this Code of Conduct acts as a framework for identifying situations of potential power imbalances, and possible aspects of conduct that might manifest as misconduct, so as to avoid these for the safety and integrity of our staff and communities we work with.

1.1. Why do we need a Code of Conduct?

- Our work at Civil Connections revolves around constant interaction with and among people – including from the top, government agencies, our funders, supporters, partners, our General Assembly. And most often, and as our central mission states – we interact regularly with local grassroots communities, and especially people in marginalized contexts – people that require our full and constant protection.
- Our capacity to ensure the protection and facilitating of our intended development benefits to these different stakeholders (“our communities”) depends on the ability of our staff to uphold and promote the highest standards of ethical conduct.
- Moreover, it is by our work’s nature that staff and the communities they work with are put in positions of unequal power relations, which further warrants the need and presence of a guiding framework for identifying, avoiding, and eliminating the exploitation of everyone.

1.2. Who this code of conduct is for:

- This Code of Conduct applies to Civil Connections and all individuals associated with our work, both in Denmark and internationally. It covers all activities that involve interactions with people from all walks of life.
- The Code applies first and foremost to all staff and volunteers based at our Secretariat in Copenhagen. It also extends to technical experts and freelancers who support our programmes and projects. Additionally, the Code is binding for our Executive Board, volunteers, interns, and any other individuals — whether formally or informally affiliated — who deliver work on behalf of Civil Connections.
- It also applies to staff and representatives of partner organisations when they are working with or representing Civil Connections in any official capacity.

1.3. The scope of this Code of Conduct in the organization’s management practice:

- This Code of Conduct is not only a moral code that serves as an illustrative guide for Civil Connections and its staff to make ethical decisions in their professional lives, and at times in their private lives. It is also an integral part of their conditions of employment. This Code of Conduct is therefore an appendix to their individual employment contract.
- All Civil Connections staff are responsible for encouraging, advocating, and promoting the dissemination of the Code of Conduct. They also have a role in implementing, monitoring, and enforcing its standard. Staff are also urged to encourage our partners and collaborators to adhere to these standards and to join us in upholding them.
- The leadership of the organization bear the responsibility to see to it that this code is upheld – where they both set frameworks and processes for ensuring that all connected staff and collaborators are aware of the standards and supportive frameworks for remembering to follow them. The leaders must also lead by or set a good example in regard to the code and regularly review it with all other stakeholders concerned.

- All Civil Connections staff are obliged to report to the organization's leadership whenever they have or hear concerns or suspicions regarding criminal or unethical activities that conflict with this Code of Conduct, and which may compromise us.

1.4. Implementation and interpretation

- While acknowledging that local laws and customs may vary from country to country, this Code of Conduct is grounded in international legal standards. For guidance on appropriate interpretation, reference can be made to the Notes to the UNHCR Code of Conduct and the UN Secretary-General's Bulletin on Special Measures for Protection from Sexual Exploitation and Sexual Abuse (ST/SGB/2003/13).
- All affiliated with Civil Connections are required to seek guidance from their leadership if they encounter situations where they are unsure about the interpretation or application of this Code of Conduct.
- Partner Organisations: All partner organisations working with Civil Connections are expected to adopt and implement this Code of Conduct or maintain equivalent standards. They must ensure their staff, members, and beneficiaries to understand and comply with these obligations when working with or representing Civil Connections.
- Civil Connections Staff: All staff, including technical experts, freelancers, volunteers, interns, and Executive Board members, must familiarise themselves with and adhere to this Code. Regular training and ongoing dialogue will be provided to support implementation.
- This Code of Conduct, along with relevant guidance materials, is available on the Civil Connections homepage to ensure transparency and accessibility for all stakeholders.

2. Core values and guiding principles this code of conduct bases on:

Civil Connections' staff are committed to the following fundamental values and principles.

- The values enshrined in the Charter of the United Nations: respect for fundamental human rights, social justice and human dignity, and respect for the equal rights of all.
- We shall actively promote adherence to the principles of international refugee law, international human rights law, and international humanitarian law.
- It is Civil Connections and its staff's primary commitment to ensure the protection of and assistance to its persons of concern, in accordance with Civil Connections mandate.
- Civil Connections and its staff are committed to supporting the fullest possible participation of persons of concern – as individuals, families, and communities – in decisions that affect their lives.
- Civil Connections and its staff will respect the dignity and worth of every individual, will promote and practice understanding, respect, compassion, and tolerance, and will demonstrate discretion and maintain confidentiality as required.
- Civil Connections and its staff will aim to build constructive and respectful working relations with partners, will continuously seek to improve performance, and will foster a climate that encourages learning, supports positive change, and applies lessons learned.
- Civil Connections and its staff will show respect for all persons equally without distinction whatsoever of race, gender, religion, colour, national or ethnic origin, language, marital status, sexual orientation, age, socio-economic status, disability, political conviction, or any other distinguishing feature.
- Civil Connections and its staff will strive to remove all barriers to equity.
- Civil Connections and its staff will respect cultures, customs, and traditions of all peoples, and will strive to avoid behaving in ways that are not acceptable in a particular cultural context. However, when the tradition or practice is directly contrary to an international human rights instrument or standard, Civil Connections and its staff will be guided by the applicable human rights instrument or standard.

- Civil Connections and its staff will not tolerate any form of sexual exploitation or abuse and are aware that misconduct is grounds for disciplinary measures including immediate dismissal and legal actions against the perpetrator.

3. Staff members' commitment

As a Civil Connections staff member, I commit myself to the following:

3.1. Preserving fairness and dignity:

- To treat all persons of concern fairly, and with respect and dignity.
- I will always seek to understand the difficult experiences that persons of concern have faced and survived, as well as the disadvantaged position in which they may find themselves in relation to those who hold power or influence over aspects of their lives.
- I will always seek to care for and protect the rights of children, and act in a manner that ensures that their best interests shall be the paramount consideration.
- If my job involves direct work with persons of concern, I will strive to fully understand their experiences and needs, and to explain the role of Civil Connections scope of work.

3.2. Upholding integrity:

- To uphold the integrity of Civil Connections, by ensuring that my personal and professional conduct is, and is seen to be, of the highest standard.
- I will demonstrate integrity, truthfulness, dedication, and honesty in my actions.
- I will observe local laws, will meet all my private legal and financial obligations, and will not seek to take personal advantage of any privileges that have been conferred on me in the interest of Civil Connections.
- When at work and/or interacting with target groups or partners, drugs are prohibited. Alcohol should only be enjoyed in a moderate manner as we remember to be role models and Civil Connection's represent.

3.3. Desisting from conflict of interest and search for personal gain:

- To perform my official duties and conduct my private affairs in a manner that avoids conflicts of interest, thereby preserving public confidence in Civil Connections.
- My actions will be free of any consideration of personal gain, and I will resist any undue political pressure in decision-making.
- I will neither give nor accept any honour, decoration, favour gift, remuneration, or bribe, to/from any partner or collaborator including government representatives. It is, however, allowed to give or accept small tokens of appreciation that are exchanged in accordance with local practices provided that it cannot compromise the integrity of Civil Connections.
- I am obligated to tell the Daily Manager about other jobs. Other jobs cannot be in violation with the values of Civil Connections.
- I will not accept supplementary payments or subsidies from a government or any other source or participate in certain political activities such as standing for or holding public office without prior authorisation.
- I will avoid assisting private persons or companies in their undertakings with Civil Connections where this might lead to actual or perceived preferential treatment.

3.4. At staff level:

- To contribute to building a harmonious workplace based on team spirit, mutual respect and understanding.

- I will show respect to all colleagues, regardless of status or position, and will allow all colleagues the opportunity to have their views heard, and to contribute from their knowledge and experience to team efforts.
- I will communicate openly and share relevant information (subject to confidentiality rules) with colleagues and will endeavour to respond in a timely manner to queries.
- I will respect my colleagues' privacy and avoid misinformation.
- I will seek to resolve differences and solve problems when they arise, and will contribute to building constructive dialogue, guided by mutual respect and an open, positive approach.
- Relationships between co-workers where power hierarchy is not at play is okay, as long as it is not interfering with the work and wellbeing of the office in general. You are obliged to tell the daily manager if you get involved romantically with a coworker.
- Any issues or concerns are discussed and reported to the daily manager. As an alternative the chairperson of the board. Contact of the chairperson does not require any prior talk with the daily manager.

3.5. At staff leadership level:

- As a leader I will be open to the views of all team members. I will provide timely feedback on the performance of each team member through guidance, motivation, and full recognition of their merits.
- To promote the safety, health, and welfare of all Civil Connections staff as a necessary condition for effective and consistent performance.
- 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 doubts regarding an instruction that I consider threatening to my safety or the safety of other persons, I will bring this immediately to the attention of my supervisor.
- As a manager, I will endeavor to ensure that the health and well-being of staff and their families are not subjected to undue risk. I will promote a healthy work-life balance for staff and will respect staff entitlements.

3.6. Confidentiality and protection of organizational assets:

- To safeguard and make responsible use of the information and resources to which I have access by reason of my employment with Civil Connections.
- I will exercise due care in all matters of official business, and not divulge any confidential information about persons of concern, colleagues, and other work-related matters in accordance with the terms of employment and current guidelines.
- I will protect, manage, and utilize Civil Connections human, financial and material resources efficiently and effectively, bearing in mind that these resources have been placed at Civil Connections disposal for the benefit of the persons of concern.

3.7. Protecting the people, we serve and collaborate with:

- To prevent, oppose and combat all exploitation and abuse of the people we serve.
- I undertake not to abuse the power and influence that I have by virtue of my position over the lives and well-being of the people we serve.
- I will never request any service or favour from communities in return for assistance.
- I will never engage in any exploitative relationships, emotional, financial, or employment-related with the people we serve.
- I will act responsibly when hiring or engaging the people we serve for private services.
- I will not engage in sexual activity with children under the age of 18. Mistaken belief in the age of the child does not constitute a defence.

- I will not engage in sexual exploitation or abuse of the people we serve, and I have a particular duty of care towards women and children.
- I will neither solicit nor engage in commercial exchange of sexual services as such relationships may undermine the credibility and the image of Civil Connections.
- I am aware that Civil Connections strongly discourages sexual relationships between its staff members and the communities we serve, although these relations are not exploitative or abusive. Such relationships may undermine the credibility and the integrity of Civil Connections and of the staff members involved. Should I find myself in such a relationship with a person of concern that I consider non-exploitative and consensual, I will report this to my supervisor for appropriate guidance in the knowledge that this matter will be treated with due discretion.

3.8. In relation to criminal actions, discrimination, and harassment:

- To refrain from any involvement in criminal or unethical activities, activities that contravene human rights, or activities that comprise our work.
- I will neither support nor take part in any form of illegal, exploitative, or abusive activities, including, for example, child labour, and trafficking of any sort.
- To refrain from any form of harassment, discrimination, physical or verbal abuse, intimidation, or favouritism in the workplace.
- I will not engage in or tolerate any form of harassment in the workplace, including sexual harassment and abuse of power.
- As a leader/supervisor, I will not solicit favours, loans, or gifts from staff, nor will I accept unsolicited ones that are of more than token value.
- I recognise that there is an inherent conflict of interest and potential abuse of power in having intimate and sexual relations with staff under my supervision. I am aware that Civil Connections strongly discourages such relations. Should I find myself in such a relationship, the board will resolve this conflict of interest without delay potentially with determination of contract.

4. Child Protection

Our work at Civil Connections and the work we do in collaborations and partnerships, entails directly working with communities across many countries in different corners of the globe. Among, and probably most prominent of these communities in our work are rural – and commonly marginalized communities in relation to resources and power structures in the countries they are located.

Yet even more marginalized of populations in these communities are those that do not have a say in the matters of their communities – those that communities expect to follow, or do as they are told – those that are at the highest risk of rights violation and exploitation in all forms – the CHILDREN. And what does the term child mean? According to the UN Convention on the Rights of the Child, a child is classed as an individual below the age of 18.

But how can we claim to facilitate the development of communities when such an important segment of their population is at risk of being violated, exploited, and alienated? How can we claim to be part of making tomorrow a better world, when the leaders in offering are violated and have no or limited space for developing their full potentials due to scourges inflicted on their lives due to violence against them?

We, at Civil Connections believe that the rights of children and the protection of these rights – and the children from any form of abuse, exploitation, or denial of self-realization as a child, is at the core of our journey to co-creating sustainable development in all the communities we work in/with. Therefore, we are committed to taking the necessary actions to support child protection actions – based on the guidelines enshrined in the following pages and paragraphs.

4.1 Purpose of the Policy:

This document – The Child Protection Policy – holds the guidelines, actions, values and rules that Civil Connections, its staff or any other person acting in the name of Civil Connections, shall act by to uphold and safeguard/protect children in all contexts we work in/with.

At its core, this policy acts as a framework for identifying situations of potential child rights abuse, so as to avoid these for the protection of the children in our work contexts. It also aims to prevent, respond to, and resolve any potential child abuse while in interaction with or in the presence of Civil Connections staff, partners and collaborators acting in the name of Civil Connections by:

- Laying out, making known and enforcing a no-tolerance policy for child abuse, exploitation, neglect, and violence.
- Promoting a common understanding of child protection issues within Civil Connections work contexts and interactions.
- Facilitating best practices development and documentation in relation to child protection in our work contexts and interactions.
- Strengthening our child protection awareness/knowledge, tools, and implementation.

4.2. Scope of the child protection policy

- This Child Protection Policy is not only a moral code that serves as an illustrative guide for Civil Connections, its staff, and collaborators to ensure the protection of children in our work. It is also an integral part of their conditions of employment. This Policy is therefore an appendix to their individual employment or engagement/collaboration contract.
- All Civil Connections staff are responsible for encouraging, advocating, and promoting the dissemination of the Child Protection Policy. They also have a role in implementing, monitoring, and enforcing the policy.
- The leadership of the organization bear the responsibility to see to it that this Policy is upheld – where they both set frameworks and processes for ensuring that all connected staff and collaborators are aware of the policy and supportive frameworks for remembering to follow them. The leaders must also lead by or set a good example in regard to the Policy and regularly review it with all other stakeholders concerned.
- All Civil Connections staff are obliged to report to the organization's leadership whenever they have or hear concerns or suspicions regarding the breach of any components of this policy.

4.3. The key focus areas of the Policy:

- Physical abuse or ill-treatment – for example, hitting or shaking a child.
- Emotional abuse – e.g., conveying to a child that he/she is worthless or inadequate.
- Neglect – e.g., inadequate care or supervision, leaving a child in a dangerous situation.
- Sexual abuse – sexual activity with a child below 18 years or below the age of consent in the country of operation, whether or not the child gives consent.
- Commercial or other exploitation – e.g., conducting marketing that misleads children.
- Online protection – e.g., inadequate data protection, online bullying or exposure to inappropriate content or contact.

4.4. Implementation of the Child Protection Policy:

The implementation of the policy is facilitated by the leadership of Civil Connections that shall ensure that its different components and frameworks of actions, monitoring and review are incorporating in all possible working frameworks of the organization. As a start, the following key guidelines will ensure a proper devolvement of the policy in the organization, its work, and collaborations.

- The Recruitment processes – in the process of recruiting employees or collaborators, Civil Connections shall put in place proper screening of relevant candidates to prevent unsuitable individuals from working with children.
- Civil Connections bears the responsibility for training employees who have frequent contact with children, and in this way facilitating and nurturing a child protection culture.
- All contracts Civil Connections offers to employees, partners, collaborators shall at the same time bear this Policy as an appendix to how such contractors shall work with and protect children in their work.
- Civil Connections leaderships shall ensure that usable instruments to monitor and report incidents of child abuse and document precautions taken are available and known to all staff members and collaborators.
- Finally, all staff, partners, collaborators and any one or entity working in the name of Civil Connections, are accountable to immediately reporting breaches or suspicions of breaches of this policy to their immediate supervisor, and if appropriate, to the national authorities.

4.5. Civil Connections – Child Protection Principles

Civil Connections,

- Defines and recognizes a child as any human being under the age of 18 years.
- Is committed to protecting children and ensuring that they gain quality care and nurturing in their everyday contact within our operations and work.
- Considers child protection the responsibility of every individual working with children on behalf of or in connections with Civil Connections work.
- Has put in place this policy, principles, and guidelines for protecting children in all aspects of our implemented by staff, partners, collaborators, and anyone working in the name of Civil Connections to ensure the wellbeing of children in contexts we work in.
- Agrees that the leadership of the organization shall promote child protection and ensure that all staff members are aware of the Policy, Principles and Guidelines.
- Has put in place suitable frameworks and systems for all individuals working with or on behalf of Civil Connections to have access, guidelines of adherence, and ways of monitoring, reflection, evaluation and reporting unwanted incidents.
- Decides that in the event that the Civil Connections Child Protection Policy standards are stricter than national legislation and/or there is a conflict between national law and the Civil Connections Child Protection Policy, the implementing staff or collaborators in the context shall immediately consult with the Leadership for guidance.

4.6. Civil Connections – Child Protection Guidelines

Anyone working with or on behalf of Civil Connections must never:

- Beat, otherwise physically assault, or physically abuse children.
- Engage in sexual activity or have a sexual relationship with anyone under the age of 18 years, or below the age of consent in the community/country of operation but always minimum 18. Mistaken belief in the age of a child is not a defense.
- Develop relationships with children which could in any way be deemed exploitative or abusive. Or act in ways that may be abusive or may place a child at risk of abuse.
- Use language, make suggestions or advice which is inappropriate, offensive, or abusive.
- Behave physically in a manner which is inappropriate or sexually provocative.

- Have a child/children with whom they are working to stay overnight at their home unsupervised unless exceptional circumstances apply, and previous permission has been obtained from their supervisor.
- Sleep in the same room as a child with whom they are working unless exceptional circumstances apply and previous permission has been obtained from the supervisor.
- Condone, or participate in, behaviour of children which is illegal, unsafe, or abusive.
- Act in ways intended to shame, humiliate, belittle, or degrade children, or otherwise perpetrate any form of emotional abuse.
- Discriminate against, show unfair differential treatment or to the exclusion of others.
- Spend excessive time alone with children away from others in a manner which could be interpreted as inappropriate.
- Expose a child to inappropriate images, films, websites e.g., pornography & violence.
- Place themselves in a position that make them vulnerable to allegations of misconduct.
- Misconduct of oneself, colleagues, or partners is reported to the daily manager. As an alternative the chairperson of the board.
- If a criminal offense, it will be reported to the police.
- In Denmark you have an obligation to notify the municipality if you are worried about a child's below 18 well being. It is written in "Barnets Lov" § 135.

Civil Connections staff, partners, collaborators, and anyone acting in the name of Civil Connections must:

- Uphold ILO's anti-child labour convention and the UN child convention.
- Listen, value, and respect all children.
- Talk with children, not to children – and keep a calm and friendly personality that assures children's safety and trust.
- Endeavor to learn the culture and culture codes in which you are working and the appropriate behaviour and language around children.
- Listen to children carefully if a child has a concern.
- Ensure that your contact/encounters with children are safe, fun, creative, learning, and positive experiences.
- Encourage and praise children's achievements.
- Keep a friendly and positive attitude to the children.
- Let children know you are there to help them.
- Ensure that children can easily find and identify you as a safe Civil Connections contact.
- Always remember that you are representing Civil Connections and all our values.

These are not exhaustive or exclusive lists. Staff, partners, collaborators and any other actor representing or working in the name of Civil Connections should at all times avoid actions or behaviour, which may allow behaviour to be misrepresented, constitute poor practice or potentially abusive behaviour – to the child/children under their practice.

NB.

- i. The policy and guidelines have been developed based on examples and our context comparison with other guidelines so as to learn from others, as well as gain a more comprehensive coverage of children related rights and safety aspects.
- ii. We work in partnership with Early Care International (ECI) an Early Child Development focused organization based in Copenhagen that from time to time offers guidance on this policy and reviews and reflection on its implementation.

- iii. We also follow working principles laid down by our Danish Umbrella platform Civil Society in Development (CISU), that from time to time reviews our policies in regard to funding possibilities and our organizational capacity. CISU also represents and infuses the Danish Foreign Ministry and Development components on a rights-based approach – and good practices in nurturing equal and respecting partnerships.
- iv. We have also been hugely influenced by the LEGO Foundation's perspective on children – especially in relation to their PLAY component.
- v. Last but not least, we pay homage to the UN declaration of Human rights, and especially the rights of the Child.

5. Anti-corruption and irregularities

5.1 Target Group

Civil Connections' anti-corruption policy outlines our principles for preventing and handling corruption, fraud, and misuse. The policy applies to Civil Connections itself, as well as, to some extent, other stakeholders. How the policy applies to each group is described in the following sections.

5.2 Objective: Completely Avoid Corruption, Fraud, and Misuse

Civil Connections does not accept any form of corruption, fraud, or misuse within our organization, our partners, our members. Civil Connections will continuously work on preventing corruption and will consistently monitor and follow up on corruption, fraud, and misuse within Civil Connections and partner organizations, and in grant-funded projects.

Civil Connections recognizes that our activities also take place in countries where, due to social and economic conditions, corruption can be widespread. Civil Connections expects ourselves and our partners to do their utmost to avoid and prevent corruption, fraud, and misuse. However, we acknowledge that they may unintentionally be affected by the problem.

Civil Connections believes that prevention is the most important area of focus. The goal is to limit or entirely avoid irregularities, including corruption, fraud, and misuse. If irregularities do occur, we aim to limit the consequences and ensure that there is adequate and effective follow-up, proportionate to the scope of the case.

Preventing corruption, fraud, and misuse is closely tied to the development of legitimate organizations marked by transparency and democratic oversight in the countries where the projects are implemented. These organizations should build structures to ensure that leadership and staff are held accountable by, for example, their board, members, and target groups.

5.3 Definitions

- Civil Connections fundamentally understands corruption as "the abuse of entrusted power and resources for personal gain." "Personal gain" includes benefit to family and friends, personal and professional networks, and platforms that enhance the power of the individual(s) involved.

- Misuse of resources can take many forms: fraud in connection with audits, unauthorized deliveries, incorrect pricing or faulty equipment, false invoicing of staff or equipment, bribery or acceptance of gifts, misuse of resources, travel fraud, theft, etc.
- Abuse of entrusted power can similarly take many forms: psychological, physical, or sexual abuse, discrimination, unjustified or arbitrary awarding of privileges, abuse of power and relationships in recruitment, etc.

5.3.1 Scope

This section of the Code of Conduct primarily focuses on misuse of resources. Other sections cover themes related to anti-corruption and abuse of power.

5.3.2 Corruption in Practice

Acknowledging that no universal definition of corrupt behavior exists, we define corrupt and dishonest practices to include the following, inspired in part by the Ministry of Foreign Affairs' definitions (this is not an exhaustive list):

5.3.2.1 Fraud

Fraud and fraudulent behavior refer to deliberate actions carried out by individuals for personal gain. This includes misrepresentation, extortion, collusion, secret agreements, embezzlement, nepotism, theft, forgery, as well as misleading or deceitful reporting of expenses related to project activities, travel, per diems, etc.

5.3.2.2 Bribery, etc.

Offering payments beyond standard fees in exchange for special services or expedited processing (also known as “greasing” or bribery) constitutes corrupt behavior and practice.

5.3.2.3 Misuse of Resources

This refers to the use of money and assets (such as the purchase of equipment not related to the project, lack of secure asset storage, or private use of project equipment) for purposes other than those stated in the grant application, as well as negligent or improper maintenance of assets.

5.3.2.4 Serious Irregularities

This refers to poor bookkeeping, delayed or missing financial reporting to partners and donors, waste in the management of material, financial, and human resources, and other failures due to lack of project management, etc.

5.3.2.5 Acceptance and Offering of Significant Gifts

Accepting or offering gifts or services that are more than symbolic—i.e., more than pens, calendars, etc.—is not allowed. Small gifts such as cookies or scarves received or given during partner country visits are acceptable as part of social customs. No one may directly or indirectly request or receive

any gift, service, or other value in exchange for actions or omissions at work, or that influence—or appear to influence—the execution of their duties or judgment. This also applies to values transferred to third parties, such as spouses/partners, children, etc.

5.3.2.6 Concealment

Concealment includes hiding or failing to disclose matters related to contract management or potential conflicts of interest in cooperation with partner organizations, service providers, suppliers, and business partners. It includes attempts to hide close family ties, financial interests, or other significant relationships.

5.4 Civil Connections

Civil Connections must neither actively nor passively be involved in corruption, bribery, or fraud as outlined above. Regardless of local customs and practices, Civil Connections will not compromise its integrity. We will not, in Denmark or abroad, give, mediate, request, or receive gifts or other services of more than symbolic value that may influence our impartiality or judgment.

5.5 Partner Organizations

We actively work to prevent our partners from participating—actively or passively—in corruption or bribery, regardless of local conditions. This applies even when bribery is a common practice in local communities.

We work actively to disseminate attitudes, knowledge, and methods for preventing corruption, fraud, and misuse to motivate and build the capacity of our member organizations and their partners. We assist in clarifying suspicions through advice and sparring with partners. We also help our partners act quickly and appropriately in confirmed cases of corruption, fraud, and misuse—this includes support with reporting, consultation, etc.

We view it as a sign of good practice and organizational strength when an organization that is unintentionally and without deliberate intent involved in bribery or corruption is transparent about its experience and takes prompt steps to address the matter.

5.6 Grant management

For all grants from pools and funds, both we as the Danish grant recipient and our partner(s) are obligated to manage the funds in accordance with the guidelines of the respective pool/fund. This includes the obligation to prevent and avoid corruption, fraud, and misuse.

Civil Connections sign declarations stating that we follow the anti-corruption clauses of the Ministry of Foreign Affairs and/or the EU.

It is our responsibility as the Danish organization to report immediately to the fund/pool if there is justified suspicion of or confirmed theft, fraud, corruption, misuse, or other irregularities.

6. Complaint and reporting Mechanisms

6.1 Introduction, Principles & Whistleblower Scheme

6.1.1 Introduction and Principles

It is possible to submit complaints about, or reports of, questionable matters across all of Civil Connections' areas of work, including matters covered by this Code of Conduct.

Civil Connections promotes an open culture, where accessibility is easy, the processes for handling complaints are clear, and decisions are reasoned and well-explained.

Complainants will not face retaliation or any discriminatory treatment from Civil Connections. However, for individuals, companies, or organizations that are proven to have made false accusations, Civil Connections may initiate various types of consequences, such as:

- Disciplinary action against employees (warnings, dismissal, or termination),
- Termination of contractual relationships with grantees or suppliers,
- Reporting to law enforcement in cases of criminal offenses, or
- Filing compensation claims for any damages incurred.

6.1.2 Types of Complaints

Civil Connections' complaint and reporting systems are divided into two categories:

1. Complaints regarding internal matters and/or employees at Civil Connections
2. Complaints about/reports concerning Civil Connections' grantees' implementation and management of their Civil Connections-supported activities, both in Denmark and abroad, including the staff involved in executing these activities.

6.1.3 Whistleblower Scheme

Civil Connections' complaint and reporting mechanisms include a whistleblower scheme. Civil Connections uses the following definition of whistleblowing (from Transparency International):
"The disclosure of information about a perceived wrongdoing in an organisation, or the risk thereof, to individuals or entities believed to be able to effect action."

Civil Connections acknowledges that individuals who report irregularities or suspicions of abuse or corruption may be under significant pressure. Reporting concerns should be a safe alternative to staying silent.

Civil Connections will make it as easy as possible for whistleblowers to report issues, while also doing everything possible to protect them from retaliation by the organization or individuals they are reporting—who may include their own employer or others on whom they depend in some way.

Therefore, Civil Connections will protect a whistleblower's identity and will do its utmost to shield them from any form of retaliation.

No sanctions will be applied for incorrect information if the report turns out to be unfounded. However, Civil Connections may take action against individuals who are proven to have made false accusations, including disciplinary steps against internal staff.

Depending on the nature of the complaint, it will be handled according to the process descriptions outlined below.

6.2 Complaints about internal matters and/or employees at Civil Connections

6.2.1 What this complaint type covers

Anyone may submit a complaint to Civil Connections concerning the quality of our work or report suspected violations, such as:

- Corruption
- Fraud
- Dishonesty
- Harassment
- Exploitation
- Abuse
- Violence
- Any other unethical behavior

6.2.2 How to submit a complaint

Anyone may submit complaints, reports of suspected abuse or corruption, and whistleblower reports by email to complaints@civilconnections.org

Additionally, it is always possible to call a Civil Connections staff member or report the suspicion in person.

6.2.3 Deadline for complaint submission

There is no fixed deadline for this type of complaint, but it should be submitted as soon as possible.

6.2.4 Composition of the Complaint Group

Complaint groups that handle complaints about internal matters and/or employees at Civil Connections shall consist of three people:

- The Chairperson
- The Vice-Chairperson
- A representative of the management.

If the complaint concerns an employee, a union representative or another support person agreed upon with the concerned employee will participate to the relevant extent in the group's investigation.

The complaint group may request anyone at Civil Connections to assist in clarifying the case. In exceptional circumstances, the group may contract an external expert or similar assistance to establish the best possible decision-making foundation.

The general rules regarding conflict of interest apply to the composition of the group.

6.2.5 Decisions of the Complaint Group

Regardless of the outcome, the complainant and any other involved parties will be informed of the decision.

There are three possible outcomes for this type of complaint:

- A. Rejection with an explanation to the complainant
- B. Referral to another relevant body (e.g., Secretariat or law enforcement), if the complaint is valid but falls outside the mandate of the complaint system—for example, complaints about working conditions, criminal matters, or other HR-related issues concerning employment.
- C. The case is decided, and the complainant is informed.

6.3 Complaints about Partners in connection with Civil Connections Activities

6.3.1 What this complaint type covers

Anyone can file a complaint with Civil Connections concerning suspected violations such as:

- Corruption
- Fraud
- Dishonesty
- Harassment
- Exploitation
- Abuse
- Violence
- Any other unethical conduct

Complaints concerning matters within Civil Connections activities should be raised and handled as close to the activity as possible.

For instance, complaints from target groups should typically be directed to the local partner organization.

If the partner itself is the source of the complaint, the issue should be raised to Civil Connections.

Civil Connections will receive and handle all complaints related to their activities, and may in some cases also choose to process complaints or reports from target groups, local partners, and other involved actors.

6.3.2 How to Submit a Complaint

Anyone may submit complaints, reports of suspected abuse or corruption, and whistleblower reports by email to complaints@civilconnections.org

In addition, it is always possible to call a Civil Connections employee or report in person.

6.3.3 Complaint Deadline

There is no fixed deadline for this type of complaint, but it should be submitted as soon as possible after the incident or discovery.

6.3.4 Complaint Handling Process

Complaints are handled in accordance with the same basic procedure outlined in the other types of complaints:

1. The complaint is submitted via official complaint channels.
2. The complaint is received, acknowledged, and registered by Civil Connections' appointed complaint registrar. The information is stored confidentially.
3. The registrar informs management/board of the receipt of the complaint.
4. A complaint group is formed according to the specific guidelines described for this complaint type.
5. The complaint is processed confidentially.
6. A decision is made, and the relevant parties are informed.

Depending on the nature of the complaint and the individuals or organizations involved, Civil Connections will determine whether a local partner, or another entity should handle the case. In some situations, Civil Connections may choose to handle it directly.

If you have any questions about the complaint mechanisms or need support in submitting a complaint, please reach out to Civil Connections via the contact information available on our website. All complaints will be taken seriously, and we aim to handle them with the utmost respect and confidentiality.

Civil Connections is committed to fostering a culture of openness, accountability, and ethical behavior. We appreciate your effort in helping us uphold these values.

7. Anti-terror

7.1 Introduction

The Danish Ministry of Foreign Affairs requires that the anti-terror clause be implemented across all grant schemes.

The anti-terror clause reflects an obligation to prevent any connection to terrorism and to comply with international sanctions. It underlines the seriousness of such matters, as breaches may result in termination of the agreement and repayment of funds.

Civil Connections' and local partners responsibilities:

It is the responsibility of Civil Connections to screen local partners to ensure they are not listed on the EU and UN terror lists. Screening must be carried out against both the EU and UN terror lists when selecting partners.

Civil Connections includes the Ministry of Foreign Affairs' anti-terror clause in all cooperation agreements between Civil Connections and the partner under CISU projects.

7.2 Civil Connections' Anti-Terror Screening

Civil Connections screens partners, collaborators, suppliers, and others against the EU and UN terror lists via the following regularly updated links:

- **EU:**
<https://data.europa.eu/data/datasets/consolidated-list-of-persons-groups-and-entities-subject-to-eu-financial-sanctions?locale=en>
- **UN:**
<https://main.un.org/securitycouncil/en/content/un-sc-consolidated-list>

Summary

- We hope that this document gives a comprehensive framework/start point and guidelines towards systematizing a professional and usable Code of Conduct in Civil Connections.
- This Code shall be interpreted as a dynamic document that shall live through all the other strategies that Civil Connections makes from time to time, as well as being integral to design and implementation of projects and activities.
- The Code is not our copyright – we envision that it is a framework that can be used by others directly or that can be based on for inspiration by actors that wish to develop their own Codes of Conduct.

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