BRF CODE OF CONDUCT

Code of Conduct	
Available in:	English[1] Greek
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Inquiries about policy	Safeguarding Officer (safeguarding@boatrefugee.com)

Boat Refugee Foundation (BRF) is an independent non-profit organisation whose organisational ideals are in line with humanitarian standards[3], focusing on people on the move (asylum seekers, refugees, and undocumented people), located near Europe's borders. BRF works with and for vulnerable people, providing essential medical and mental health support while promoting and protecting dignity and fundamental rights for all.

This Code of Conduct applies for:

- Paid staff: Anyone who is working under a written employment contract and receives a monthly salary for the work they perform, including staff in the Netherlands and (local) staff at the programme locations.
- Volunteer professionals: anyone supporting the organisation on a volunteer contract; including visiting volunteers and local, external interpreters receiving a stipend
- Community volunteers**: people who stay at a reception facility, reception accommodation or shelter or who are still in an asylum procedure (including appeals), volunteering with the organisation.
- External relations: all contractors e.g. consultants, journalists, photographers, videographers, external media, ambassadors, donors, guests, visitors and supporters (visiting the field).

The purpose of this Code of Conduct is to outline and guard our professional behaviour. This Code of Conduct applies to all BRF team members regardless of the countries and locations in which BRF operates. When working for BRF, your behaviour influences how the organisation is perceived. Your statements and conduct, both during and outside working hours, can be interpreted as an expression of BRF's point of view. We therefore expect the code of conduct to be followed both during and outside working hours*
*Working hours are considered as the time slots where BRF team members are scheduled to perform work tasks in a designated location and for a specified and prior agreed duration, as decided by the coordination team

[1] In the event of any inconsistency between the English version of this Code of Conduct and any other language translations, the English version shall take precedence.
[2] This policy applies to Boat Refugee Foundation in the Netherlands, its Greek foreign branch and any subsidiary organs of the organisation. BRF may unilaterally introduce, vary, remove or replace this policy at any time, providing due notice.
[3] Humanity, neutrality, impartiality and independence.

1. NON-DISCRIMINATION AND NEUTRALITY

BRF provides healthcare support free of charge based on vulnerability and needs, regardless of gender, nationality, ethnicity, political association, religion, sexual orientation and/or disabilities, and without any form of discrimination. At BRF we value diversity in our team and therefore we work together as colleagues and respect each other's different backgrounds.

Do not engage in evangelisation, preaching, moralising or proclaiming any religious or political beliefs while on shift BRF. Be mindful that you could be considered by others as a representative of BRF outside of working hours.

2. POWER DYNAMICS

Power imbalances exist between supervisors and supervisees, between paid staff and volunteers, between volunteers and community volunteers and between staff of BRF and (potential) service users. Power imbalances can exist on the basis of differences in responsibilities, decision-making, seniority, experience, social or professional status, legal status, dependency, financial means and/or gender (expression). It is essential that all BRF team members are aware of and understand these power differentials and take all measures, as described in this Code of conduct, to prevent any form of abuse of power or what may appear to others as abuse of power.

3. EQUALITY AND NON-PREFERENTIAL TREATMENT

BRF provides support on the basis of equality, whilst acknowledging that there is an inherent difference in privilege and power dynamics in our working environment. We provide support on the basis of needs alone without preferential treatment of individuals or groups based on personal relations.

In the interest of equality, non-preferential treatment and avoidance of abuse of power or any appearance of abuse of power, the following is strictly prohibited:

- Providing or promising services to (potential) service users, including any community volunteers outside BRF's field of work and protocols, such as, for example, legal advice, arranging alternative accommodation or restoring family ties. Private donations by any team member to a (potential) service user are prohibited*. The distribution of goods such as money, gifts, presents, phones, food or drinks or acceptance of any monetary or non-monetary gifts is not tolerated under any circumstances.

Avoid the following*:

- Inviting (potential) service users, including community volunteers, to volunteer/staff housing.
- Entering reception facilities, reception accommodation or shelters for which you are not registered/authorised to enter.
- Entering (or being in) reception facilities, reception accommodation or shelters outside working hours or without an approved work-related purpose
- Going into the sleeping and living quarters of (potential) service users inside or outside reception facilities, reception accommodation or shelters.
- Entering and organising one-to-one meetings with (potential) service users inside or outside reception facilities, reception accommodation or shelters outside your

professional schedule and/or work. Engaging in non-work related contact by phone or social media with (potential) service users or community volunteers during your tenure with BRF. BRF phones / sim cards must be used for all work-related contact with (potential) service users. Exchanging personal data with (potential) service users

**In good faith, an exception to the terms dictated in this section is made, outside of working hours, for community volunteers residing in an accommodation facility towards members of the community.

4. PROFESSIONAL ETHICS

We strive to achieve an inclusive, respectful and professional working environment. All staff members shall behave with respect to each other and the environment that we are working in. There is a non-tolerance toward theft, fraud, destruction and repurposing of BRF's assets.

We keep ourselves to the highest standards of professionalism. Do not let other people, who are not registered and selected by BRF, participate in and work as a part of our team, work, or activities. Do not work - paid or voluntarily - for another organisation in the same context, in addition to your work for BRF without consulting and obtaining permission from your supervisor or Human Resources (HR).[4] Do not take part in any activity that causes a conflict of interest, such as employment and/or volunteering that could potentially be harmful or go against BRF's interests.

Staff members are not allowed to provide medical support without credentials. Staff members are not allowed to provide MHPSS support without credentials or authorisation from BRF. In no circumstance should any staff member provide services outside of the scope of BRF projects, such as providing legal advice, arranging alternative accommodation, or family reunification.

Concerns about specific vulnerable people in need of support that BRF does not offer, can be brought to the attention of the respective coordinator who will assess if BRF could refer or address them. Any decision taking on such matters are final and at the full discretion of the coordination team.

5. DRUGS AND ALCOHOL

Any form of substance abuse is incompatible with the health and safety standards of BRF. Working or being on-call under the influence of alcohol, narcotics, or psychoactive substances is strictly prohibited. Outside working hours, the use of alcohol is not banned, but the use of good judgement is required in compliance with local laws. Be mindful that you could be considered by others as a representative of BRF outside of hours.

6. A CRIMINAL-HISTORY CHECK

A criminal record check (or self-declaration in exceptional cases, such as for community volunteers) is mandatory. Withholding information, or providing false or misleading information about a criminal conviction (or charges) before or during your tenure with

[4] Paid staff members report other activities they (wish to) engage in to the HR manager (hr@bootvluchteling.nl); if such activities do not clash with BRF's interests and are permitted, they will be documented in the personnel file of the staff member.

BRF are grounds for immediate dismissal. BRF may choose to report such actions to the authorities.

7. ABIDING BY THE LAW

It is the responsibility of all team members to abide by the law of the country that we are working in. Staff members are subject to the local and national jurisdiction in which they work.

8. INTIMATE RELATIONSHIPS

Intimate relationships are defined as interpersonal relationships that are romantic, emotional, physical or sexual in nature to which all parties consent. Many intimate relationships are shaped by power dynamics. BRF strongly discourages intimate relationships between team members where a power imbalance exists due to direct or indirect reporting or supervision lines.

Because of the inevitable power imbalance, intimate relationships between team members (paid staff, volunteer professionals and representatives) and (potential) service users including any community volunteers are not permitted. Any community volunteers will be excluded from any activities where a service is provided specifically to a (potential) service user with whom they are engaged in an intimate relationship.
Intimate relationships between team members should be disclosed to the direct supervisor(s) and Human Resources (HR - hr@bootvluchteling.nl)..
All team members who are entering into an intimate relationship need to consider the potential consequences related to power, responsibilities and boundaries. Relationships should not be disruptive to team dynamics or have a negative impact on the working environment in general. Either party may withdraw consent at any time in any manner. If an intimate relationship between team members (potentially) disrupts work relations, the working atmosphere or performance, BRF reserves the right to intervene.[5]

9. PROTECTION AGAINST ABUSE AND EXPLOITATION

BRF believes that everyone has the right to be protected against any form of abuse (sexual or otherwise)[6] or exploitation[7], including, but not limited to abuse of power, bullying[8], intimidation[9], discrimination[10], aggression[11], harassment[12], violence[13] or sexually

[5] BRF will always opt for the least intrusive intervention.
[6] Abuse is a general term covering all forms of physical and/or emotional ill-treatment, sexual assault, neglect or negligent treatment or exploitation resulting in actual or potential harm to a persons health, survival or dignity in the context of a relationship or responsibility, trust or power.
[7] Exploitation is any actual or attempted abuse of a position of vulnerability, differential power or trust for (sexual) purposes, including, but not limited to, profiting monetarily, socially or politically from the (sexual) exploitation of another.
[8] Bullying is a term for actions or words that seek to harm, intimidate, or force in order to gain power and control. Examples: unnecessary criticism, spreading rumours, intentionally undermining, deliberate isolation, making inappropriate personal comments, hitting, pushing, damaging or stealing personal possessions.
[9] Intimidation relates to the frightening or threatening of someone, usually in order to force or deter an action.
[10] Discrimination relates to any distinction, exclusion or restriction on the grounds of disability or other criteria (sex, age, ethnic origin, etc.) which has the purpose or effect of compromising or preventing the recognition, enjoyment or exercise of all human rights on an equal basis with others.
[11] Aggression refers to feelings of anger and antipathy resulting in hostile or violent behaviour that is intended to harm another individual.
[12] Harassment consists of repetitive and unwanted conduct, whether verbal, physical or visual, which is related to a person's profile or characteristic with the purpose or effect of violating the dignity of a person or creating an intimidating, hostile, degrading, humiliating or offensive environment. Violence is behaviour involving physical force intended to hurt, damage or kill someone or something.
[13] Violence is behaviour involving physical force intended to hurt, damage or kill someone or something.

transgressive behaviour[14]. Any form of abuse or exploitation is strictly prohibited. All team members are obliged to create and maintain an environment which prevents any form of abuse or exploitation. Team members should:

- Provide and contribute to an environment and atmosphere in which (potential) service users and team members feel safe and respected.
- Avoid treating (potential) service users and team members in a way that affects their dignity.
- Do not intrude further into (potential) service users' or team members private lives than is functionally necessary.
- Avoid any form of sexual approach and abuse towards (potential) service users and team members.

All sexual acts and sexual relations between teammembers and a minor, are not permissible under any circumstances and are considered sexual abuse. Do not touch (potential) service users or team members in such a way that could reasonably be expected to be perceived as sexual or erotic in nature. The same applies to use of language and expressions.

You have a duty to protect (potential) service users to the best of your ability from forms of unequal treatment and abusive behaviour and you will actively ensure that the code of conduct is observed by everyone involved with (potential) service users. Any (suspected) violations should immediately be reported to the Safeguarding Lead via safeguarding@bootvluchteling.nl or using this form. - See also section 15 of this document.

10. PRIVACY AND DATA

Make responsible use of BRF's information, employee and (potential) service users data (including images and stories) and internal reports. Do not share confidential information (medical, psychosocial, personal or organisational) with third parties or colleagues unless approved by your supervisor. Please use the allocated pathways only as communicated by BRF staff (ie Google drive or Signal chats). Delete all images and documents from the device(s) once an action is completed.

11. MEDIA AND ADVOCACY

During and after your tenure, please do not speak to (inter)national media or in public on behalf of BRF unless authorised and coordinated with the BRF communications department. For questions inquire with the communications department (pers@bootvluchteling.nl) or with your supervisor.

Do not engage in advocacy activities (or opinion sharing) with authorities or representatives from international organisations (such as the UN or EU) on behalf of BRF unless authorised and coordinated with the advocacy coordinator (advocacy@bootvluchteling.nl). This excludes the freedom of community volunteers to advocate for their rights as people on the move.

[14] Any form of sexual behaviour or sexual advances, whether verbal, non-verbal or physical sense, intentionally or unintentionally, which is experienced by the person undergoing it as unwanted or forced; and/or takes place within an unequal power relationship and/or other acts or conduct that are punishable under criminal Law.

We enforce a strict media policy at our projects to protect the privacy of team members and (potential) service users. Only authorised team members, a photographer or videographer hired by BRF are allowed to take pictures after they have received informed consent from the individual being photographed, filmed or interviewed (or a caretaker when the person is below the age of 18).

12. WORKING IN OR VISITING THE FIELD

Do not organise or engage in meetings or any kind of activity with (potential) service users, outside your working hours. Do not enter your work facility (e.g. reception facilities, reception accommodation or shelters) outside of working hours or without a work-related purpose.

Interactions outside of working hours with community volunteers who live inside reception facilities, reception accommodation or shelters, should only happen in public places and in group settings and with prior notice given to your supervisor.

Do not exchange personal details (such as email addresses, phone numbers, or social media accounts) with (potential) service users or engage in non-work-related contact with people receiving our services during your tenure with BRF.

Do not participate in demonstrations or visit places that could be considered dangerous during your tenure with BRF without informing and consulting with your supervisor. Be mindful that you could be considered by others as a representative of BRF outside of working hours.

13. SAFETY AND SECURITY

Team members working in or visiting the field should abide by the safety and security protocols. Report safety and security incidents to: https://forms.gle/S2566f2ki39YJQkE8. Examples of safety and security incidents include: fights in or near our premises, fires, violence and/or aggression in BRF premises and demonstrations.

We ask all team members to be prepared for safety and security incidents by reading and watching preparation materials provided by BRF.

Please be aware that it is not allowed to wear BRF-branded items outside working locations and hours for safety and security reasons.

14. WHISTLEBLOWING - REPORTING OF SERIOUS CONCERNS

It is the responsibility of all staff members to report any (suspected) activity by people within the organisation that could be considered illegal, dishonest, fraudulent, unethical or in violation of the policies of the organisation.

Report any (suspected) activity by people within the organisation that could be considered illegal, dishonest, fraudulent, unethical or in violation of the policies of the organisation through this online form: https://forms.gle/S2566f2ki39YJQkE8

The information in this form is confidential and will only be shared with the appropriate individuals - for Whistleblowing this will be the Human Resources department. The form will be held in a safe and secure place. For more information see BRF's whistleblowing policy.

15. SAFEGUARDING - REPORTING (SUSPICIONS OF) ABUSE

You are obliged to report any abuse or suspicions of abuse (safeguarding incidents). Failure to report or the covering up of a safeguarding incident is a serious breach of BRF's policy and could lead to disciplinary actions or appropriate external measures.

Report abuse:

Report abuse, or suspicion of abuse to the safeguarding and compliance officer[15] by filling an (online) Incident Reporting Form https://forms.gle/S2566f2ki39YJQkE8

The online Incident Reporting Form can be filled in anonymously. It is also possible to send an email to the safeguarding and compliance officer (safeguarding@boatrefugee.com).

The information in this form (or shared by email) is confidential and will only be shared with the safeguarding and compliance officer and appropriate individuals in accordance with the Safeguarding Handbook. This form will be held in a safe and secure place. If you are worried about being identified as the person making the report, then you can make a disclosure anonymously.

Safeguarding Focal Point:

If you have questions about safeguarding or need support with filling out the (online) report you could contact your local Safeguarding Focal Point.[16] If the Focal Point fills in the form on behalf of someone else, they will state this clearly in the report.

The Safeguarding Focal Point is also responsible for informing (potential) service users about the procedure to be followed when reporting abuse or a suspicion of abuse. The Focal Point will also facilitate that (potential) service users are able to make a report in their own language if necessary.

For more information see BRF's safeguarding handbook.

16. REPORTING CODE OF CONDUCT VIOLATIONS

Report behaviour which could be violating this code of conduct as soon as possible following these steps:

Step 1 - The team member should first inform their line-manager or supervisor of any (suspected) code of conduct violations. If you feel uncomfortable about reporting a code of conduct violation to your line-manager or supervisor, or if you have a reasonable belief that they are part of the violation, proceed with step 2.

[15] The Safeguarding and Compliance Officer is the staff member from the office in the Netherlands who is responsible for the effective management of safeguarding incidents.
[16] There is a Safeguarding Focal Point at each field location where the organisation operates. They are the first point of contact for safeguarding issues and support the Safeguarding and Compliance Officer.

Step 2 - Report code of conduct violations to the safeguarding and compliance officer through this online form: https://forms.gle/S2566f2ki39YJQkE8 or by sending an email to the safeguarding and compliance officer (safeguarding@boatrefugee.com).

The information in this form is confidential and will only be shared with the appropriate individuals: For Code of Conduct with the Human Resources department or Volunteer Coordinator and when appropriate, this will also be shared with the Line Manager or coordinator of the team. This form will be held in a safe and secure place. If you are worried about being identified as the person making the report, then you can make a disclosure anonymously.

17. SIGNING

By signing this document, you declare that you have read and understood this code of conduct, the safeguarding handbook and BRF's whistleblowing policy, c You understand that violating this code of conduct will lead to disciplinary actions or appropriate external measures, such as, but not limited to, referrals to (local) authorities.

By signing you also declare to report without delay any safeguarding concerns, any (suspected) activity by people within the organisation that could be considered illegal, dishonest, fraudulent, unethical or in violation of the policies of the organisation or behaviour that could violate this code of conduct.

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Name and surname Date

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Signature Place