



Global Code of Conduct

For all Trócaire representatives

Table of Contents

POLICY MANAGEMENT INFORMATION	2
DECISION-MAKING IN RELATION TO THE POLICY	3
KEY MESSAGES	3
1. Policy Statement	4
2. Aim	4
3. Scope	5
4. Definitions	5
5. Responsibilities of the Code of Conduct	5
6. Code of Conduct	6

POLICY MANAGEMENT INFORMATION

Title:	Global Code of Conduct
Author (Responsible):	HR Partner International
Owner (Accountable):	Director of Corporate Services
Division:	Corporate Services
Contact:	hr@trocaire.org
Version No.	2.1
Status:	Final
Reviewed by (Consulted):	HR, Chief Risk Officer, Safeguarding, Compliance, IT
Approved by:	Policy Steering Committee; Board (June 2022, version 2.0)
Date of latest approval:	13 December 2023
Applicable to (Informed):	Employees, volunteers, consultants and other third parties carrying out activities on behalf of Trócaire. ¹
Communicated on:	2024-Q1
Last reviewed:	December 2023
Summary of Changes	<p>Updated wording to provide further clarity in the paragraphs on:</p> <ul style="list-style-type: none"> • Safeguarding- combining three policies into a Global Safeguarding policy. • Update to wording on Mission and Values; Professional Conduct; Safeguarding; Data Protection; IT and Media & Photographic Guidance.
Frequency of review:	Annually
Date of next review:	December 2024
Related policies & procedures:	<p>Further information on some of the behaviours expressed in this Code of Conduct can be found in the relevant key Trócaire policy or procedural documentation. All Trócaire policy documents are available to all employees through their employee handbook, global policies folder on Box, TG - Global Policies or from their HR focal point.</p> <ul style="list-style-type: none"> • Trócaire as a Church Agency • Trócaire Behavioural Competency Framework • Global Safeguarding Policy • Complaints Policy – International • Dignity at Work Policy • Social Media Policy • Trócaire’s Visual Identity Guidelines • Investigation Procedure • Discipline and Grievance Procedures (refer to Country Employee Handbook) • Recruitment Policy • Whistle Blowing (Protected Disclosures) Policy • Fraud, Theft, Corruption & Bribery Policy • Security Policy and Procedures • I.T. Acceptable Usage Policy • Global Counter Terrorism and Anti Money Laundering • Conflict of Interest Policy

¹ There is a separate Code of Conduct for members of Trócaire’s Governance structures (i.e. Company Members, Board Directors and Board Committee members), which is consistent with the principles of this Code of Conduct.

	<ul style="list-style-type: none"> • Data Protection Policy • Counter Modern Slavery, Trafficking in Persons and Child Labour Statement <p>This list is not exhaustive, and all Trócaire Policy and Procedures are expected to be adhered to as part of the agreed engagement with Trócaire, i.e. contract of employment, consultant contract, terms of reference, volunteer agreement etc.</p>
--	---

DECISION-MAKING IN RELATION TO THE POLICY

Responsible (Author)	HR Partner International
Accountable (Owner)	Director of Corporate Services
Consulted	Policy Steering Committee, Relevant Policy Holders (HR, Chief Risk Officer, Safeguarding, Compliance, IT), Board
Informed	All Trócaire representatives including Employees, with Management in particular

KEY MESSAGES

Why do we have this policy?	Trócaire expects all of its representatives to conduct themselves in a manner that upholds the rights of every individual to dignity and respect.
Who does this policy apply to?	Those who represent Trócaire, including employees, volunteers, consultants and other third parties carrying out activities on behalf of Trócaire. There is a specific code for members of Trócaire’s Governance structures that is consistent with the principles of this Code of Conduct.
What are the key things I need to know?	Provides expectations on appropriate behaviours.
What are the key things I need to do?	Be aware of the Global Code of Conduct and the appropriate behaviours expected of all Trócaire representatives.
Where can I find more information?	Employee handbook, related policies and procedures, line manager and Trócaire/HR focal point.
Support Implementing the Policy	This policy has been developed in consultation with key stakeholders across the organisation and subject matter experts. If you are unsure of how this policy applies to you, please contact the Policy Author.

1. Policy Statement

In line with our vision, mission and values, Trócaire expects all of its representatives to conduct themselves in a manner that upholds the rights of every individual to dignity and respect.

Vision:

We are working to create a fairer world where:

- the dignity and rights of all people are respected;
- the planet's natural resources are used sustainably and equitably;
- people have control over their own lives;
- those with power act for the common good.

Mission:

We work with local partners in the world's most at-risk communities and with people in Ireland to tackle the underlying causes of poverty and injustice and respond to the crises they create. Together we bring about positive and lasting change for a just world.

Values: Solidarity, Participation, Perseverance, Courage, Accountability. Further details can be found at www.trocaire.org/about/values.

Trócaire's work is grounded in Catholic Social Teaching and is in line with the teachings of the Catholic Church.

2. Aim

This Code of Conduct expresses the expectations of Trócaire on all employees, volunteers, consultants and third parties regarding the manner in which activities are carried out and the conduct of all parties as a Trócaire representative. Trócaire expects its representatives to carry out their activities with the utmost integrity and in accordance with this Code of Conduct and all of its related policies and procedures, including Trócaire's Behavioural Competency Framework.

Trócaire's global HQ is in Ireland, therefore this Code of Conduct is based on Irish legislation and relevant international NGO commitments. However, compliance with all legal obligations within all countries that we work is also an explicit requirement.

Trócaire views the safeguarding of children and adults at risk of abuse, exploitation or harassment as a critical part of its Mission, Vision and Values and so, lays particular emphasis on the prevention of abuse and exploitation by Trócaire employees, volunteers, consultants or other third parties in undertaking of Trócaire activities. Trócaire will not tolerate discrimination on any grounds, internally or externally.

Trócaire is the overseas development agency of the Catholic Church in Ireland. Our work is grounded in Catholic Social Teaching (CST) and is in line with the teachings of the Catholic Church. Trócaire has a proud tradition of working with people of all faiths and none, and with a wide range of organisations where we share the same vision. Trócaire representatives have a right to hold personal views that differ from Catholic Church teaching. However, all representatives have a responsibility to understand Trócaire's position on sensitive issues, including abortion, and to ensure that their behaviour in the public sphere does not lead to reputational damage for Trócaire. Trócaire's position is made public on our website and is fully detailed for colleagues in our policy and training materials on 'Trócaire as a Church agency'.

3. Scope

This Code of Conduct is applicable to all Trócaire employees, volunteers, consultants and other third parties carrying out activities on behalf of Trócaire, and/or its subsidiaries, branches and group organisations. For the purposes of this document all parties will be referred to as a Trócaire Representative.

Managers have a particular responsibility in promoting and upholding this Code of Conduct and ensuring that all Trócaire Representatives for whom they are responsible understand and are compliant with this Code of Conduct.

Although Trócaire acknowledges that Trócaire Representatives have both a professional and private life, external perceptions may not make the same distinction. There are many posts and / or locations and / or public fora (including electronic) where Trócaire Representative are identifiable as Trócaire and their behaviour is attributable to Trócaire, therefore their behaviour could potentially damage the reputation of Trócaire.

Trócaire Representatives are therefore required to take account of the principles of the Code of Conduct, to be aware of how their behaviour may be perceived both at work and outside of work, and both online and offline, and to ensure their behaviour does not cause potential harm to the organisation, its staff, partners, community members or other stakeholders.

4. Definitions

N/A

5. Responsibilities under the Code of Conduct.

All Trócaire Representatives have a responsibility to ensure that this Code of Conduct is implemented and adhered to.

The Executive Leadership Team and all managers have a responsibility to ensure all employees and other Trócaire Representatives abide by the Code of Conduct.

5.1 Dissemination & Implementation Plan

5.1.1 Board Members, Committee Members, Company Members and Directors

A complementary Code is in place for members of Trócaire's governance structures, including Board Members, Committee Members, Company Members. It is the responsibility of the Director of Corporate Services to engage with the governance structure of the organisation and ensure that this Code of Conduct is signed up to before carrying out any activities on behalf of Trócaire.

5.1.2 Employees

This Code of Conduct is attached to the contract of employment for all new hires and forms part of the terms and conditions of employment. The Code of Conduct applies to Trócaire employees throughout their employment with Trócaire. It is the employee's responsibility to be familiar with the Code of Conduct and any changes that may be made to it.

Trócaire will provide training and updates to the Code of Conduct as appropriate and communicate these to employees through appropriate channels. Organisational policies will provide further details and guidance related to certain aspects of the Code of Conduct.

5.1.3 Consultants, Volunteers and Other Third Parties

It is the responsibility of the hiring manager to ensure that this Code of Conduct is given to all Trócaire Representatives to read and sign up to before carrying out any activities on behalf of Trócaire.

6. Code of Conduct

Trócaire expects all Trócaire Representatives to adhere to the core principles laid out in this Code of Conduct both in work and outside of work. The Code of Conduct outlines the responsibility of all employees, directors, trustees, company members, volunteers to engage at all times in professional behaviour. It does not describe all prohibited conduct, however, and employees may be disciplined for inappropriate conduct that is not addressed in this policy document.

As a representative of Trócaire, you agree to carry out all activities for Trócaire in line with the following principles and standards:

Personal/Professional Conduct and Professional Ethics

- I shall ensure that my personal and professional conduct is, and is seen to be, of the highest professional standard in keeping with the Vision, Mission and Values of Trócaire.
- I will treat all people equally, with dignity and respect.
- I will not discriminate or tolerate discrimination against any person or group, on any grounds including: - culture, ethnicity, race, gender, age, sexual orientation, religion, disability, marital status, family status, or membership of any minority or marginalised identity group.
- I will refrain from any form of bullying, harassment, victimisation, discrimination, abuse, intimidation or exploitation, or in any other way infringing the rights of others.
- I will uphold Trócaire's safeguarding commitments in both my professional and personal lives.
- I will not abuse the position of power that is inherent due to my role with Trócaire.
- I will ensure my behaviour, both during and outside of work, does not impact or undermine my ability to undertake the role for which I am employed.
- I will not work under the influence of alcohol or drugs or illegal substances.
- I will ensure my actions and conduct, both during and outside of work, do not potentially cause offence to another person and do not bring the organisation's name and good standing into disrepute.
- I will make myself aware of and observe local laws in all countries where I may work. I will respect and be sensitive to local customs and culture. In the case of practices that may be harmful, I will adhere firstly to Trócaire policies and Code of Conduct in both my personal and professional interactions. I understand that I may also seek guidance from senior management on safe mechanisms to address harmful practices, in the communities where we work and/or on harmful norms or attitudes on gender inequality or other forms of discrimination held among colleagues or peers.

Trócaire as a Church agency

- I recognise that Trócaire is a Catholic agency. I understand that I have the right to hold private opinions that differ from formal Catholic Church teaching. However, I understand that I have a responsibility not to cause reputational damage to the organisation by my behaviour in public, in real life or online.

Criminal Activity

- I will not involve myself in any criminal activities, activities that contravene human rights or those that compromise the work of Trócaire and our partners.
- I will not abuse or exploit programme participants in any way and will report any such behaviour of others to the management of Trócaire.
- I will not use, distribute, sell or be in possession of illegal goods or substances.

- I will immediately disclose to Trócaire any current and past criminal convictions or charges in particular those relating to child abuse, when I join Trócaire or whilst working with Trócaire.

Corruption and Conflicts of Interest

- I will declare any financial, personal, family (or close intimate relationship) interest in matters of official business which may impact on the work of Trócaire – e.g. contract for goods/services, employment or promotion within Trócaire, partner organisations, civil authorities, or programme participants groups in accordance with the Conflict of Interest Policy.
- I will act in accordance with the Fraud, Theft, Corruption and Bribery Policy including reporting any suspicious incidents to the relevant parties.
- I will notify Trócaire if I am nominated as a prospective candidate or another official role for any political party.
- I will disclose to Trócaire if I am a member of a Board of Management, Board of Directors or similar role, in either a paid or a voluntary capacity.
- I will not act in situations in which my personal interests may conflict, or appear to conflict, with the position or interests of Trócaire or its Partner Organisations.

Security, Health and Safety

- I will be responsible for my own health, safety and welfare.
- I will not negligently or wilfully engage in any unreasonable activity that could endanger my colleagues' health, safety and wellbeing.
- I will be aware of situations which may present health, safety and security risks and manage these appropriately.
- I will comply with any local guidelines for security, in a manner consistent with Trócaire's Security Policy.
- I will adhere to all organisational health and safety policies and procedures in force in my work place.
- I will report any concerns near misses or incidents at the earliest opportunity.
- I will adhere to all national level public health guidelines in my work location, or international public health guidelines if these are deemed more appropriate by Trócaire.

Safeguarding Children and Adults

- I understand that Trócaire has zero tolerance to exploitation, abuse and harassment (including sexual exploitation, abuse and harassment).
- I will work actively to promote the best interests of children and adults.
- I will, in all my activities regardless of location, seek to ensure that the best interests of children and adults who may be vulnerable / at risk are promoted and protected. I will not engage in behaviour that is likely to cause harm, including physical, sexual, emotional abuse, neglect and exploitation and will report any such harm in line with Trócaire's Safeguarding Policy.
- I recognise and will uphold Trócaire's safeguarding commitment in both my professional and personal life.
- I will act in line with Trócaire's Safeguarding Policies and relevant guides.
- I will encourage children and adults to feel comfortable enough to point out attitudes and behaviour they do not like and to know where and how to make a complaint where necessary.
- I will support an environment that is open to receiving safeguarding concerns and complaints and be aware of how I should respond in the event of a safeguarding disclosure to me (as per Trócaire's Safeguarding policies and training).
- One-to-one situations where staff and programme participants are alone are strongly discouraged. If there are **rare** cases where this is required then a risk assessment must be conducted (**and signed by the Country Director or Head of Department**) and risk mitigations implemented (e.g. discussion happens in line of sight of others).

- I will not trivialise or exaggerate issues of abuse of children or vulnerable adults.
- I understand that Trócaire's safeguarding commitments comply with international standards, and must be upheld even if these are not currently within local legislation.
- I will report any safeguarding (including those relating to sexual exploitation, abuse and harassment) concerns immediately as per Trócaire's Safeguarding Policies
- I understand there is a mandatory duty to report.
- I will not engage in sexual interaction with a person under the age of 18 years (regardless of the age of consent locally), or enter into a sexual relationship with a programme participant or into commercial sexual transactions (exchange of money, goods, services or favours).
- I will act in line with Trócaire's Modern Slavery, Trafficking in Persons and Child Labour statement.

Data Protection and Information Security

- I will abide by Trócaire's Data Protection and Information Security Policies and procedures concerning the use of Trócaire's IT assets, its data, its infrastructure, and information and communications systems.
- I will not release to others any private, sensitive or confidential information including intellectual property relating to Trócaire (or for which Trócaire is responsible) to any person(s) outside the organisation unless it is legally required to do so or approved by my manager.
- I will only use Trócaire's name, logos and brand, with express permission, whether communicating internally or externally, in line with Trócaire's Visual Identity Guidelines to ensure protection of our reputation and brand.
- Any personal data (including any sensitive information) that I process in the course of my work, I will do so in line with Trócaire's Data Protection Policies, any related data classification, handling, or management policies, and procedures or relevant data protection legislation.
- I will take particular care to inform myself about the data protection and information security policies and procedures that are relevant for my position and day to day work and will complete all required data protection and information security training.
- I will not process any personal data managed by Trócaire for my personal benefit.
- I will at all times respect the dignity and privacy of the individual whose data is being processed and at no time knowingly put individuals at risk of physical, financial or reputational harm through malice or careless processing of their data.
- I will report immediately any suspected data breach (dpo@trocaire.org) or information security breach (itservices@trocaire.org).

I.T.

- I will abide by Trócaire's IT Acceptable Usage policy and procedures, and other applicable policies concerning the use of Trócaire's IT assets, its infrastructure, and information and communications systems.
- I will not use Trócaire contacts, networks, or other resources to advance my own personal or business activities or interests.
- I will not use the organisation's computer equipment or other technology, equipment or services to engage in any activity that is illegal under local, state or international law or that encourages conduct that would constitute a criminal offence. This includes any material that victimises, harasses, degrades, or intimidates an individual.

Media and Photographic Guidance

- I will ensure that the portrayal of individuals and their circumstances is fairly represented in terms of their capacities and vulnerabilities in terms of their dignity, capacity and vulnerability, in line with Trócaire's Use of Images Policy, commitments under the Dóchas Guide to Ethical Communications and additional guidelines listed in Trócaire's Safeguarding policies.

Resources and Assets

- I will ensure that I use Trócaire property, funds and resources to which I have access in a responsible and careful manner and am accountable for their use, according to Trócaire's policy and procedural requirements. Resources and property include Trócaire vehicles; telephones, photocopiers, and stationery; other office equipment or equipment/resources belonging to Trócaire; computers, including the use of email, internet and intranet; and Trócaire accommodation (including Trócaire housing in international locations).
- Upon the end of my employment or service with Trócaire, I shall return all property issued to me by the Organisation.

Professional Development

- I will take responsibility for my continuing professional development by a combination of approaches and techniques (relevant reading and research, industry journals, reflection and review, and/or accredited courses) to enhance the quality of my knowledge, skills and competence.

Global Counter-Terrorism and Anti-Money Laundering

- I will never knowingly support, tolerate or encourage terrorism or the activities of those who embrace and/or finance terrorism.
- I will not facilitate the "laundering" of the proceeds of crime, whereby the money is "washed through" an organisation in an attempt to disguise its origin.

Duty to Report

- I will report any concern, suspicion and/or incident which breaches the standards within this Code and any other Trócaire policy to the relevant party as outlined in the policy or directly to the Head of HR. I will not intentionally make false accusations in relation to this Code against any individual.
- I will report any concern, suspicion and/or incident, which breaches the standards within this Code, regardless of whether I feel it is current, recent, or historical. There is no timeframe on reporting alleged breaches of this policy.
- I will not penalise or permit penalisation against anyone who reports risks or incidents of wrongdoing.

The above is not an exhaustive list of examples of how Trócaire Representatives should conduct themselves and representatives have a responsibility to use their own initiative and give careful consideration about the choices they make and the impact they may have on the organisation.

Breaches of this Code of Conduct, other relevant policies and procedures, may lead to disciplinary action up to and including dismissal.

Signed Agreement

I agree to accept and work within the Code of Conduct in its entirety, noting in particular the commitments I am making with regard to:

- Personal/Professional Conduct and Professional Ethics
- Trócaire as a Church Agency
- Criminal Activity
- Corruption and Conflicts of Interest
- Security, Health and Safety
- Safeguarding Children and Adults
- Data Protection and Information Security
- I.T.
- Media Visits and Photographic Guidance
- Resources and Assets
- Professional Development
- Global Counter-Terrorism and Anti-Money Laundering
- Duty to Report

I understand that it is my responsibility to seek clarity or raise concerns, with my line manager or my Trócaire/HR focal point, prior to engaging in, or abstaining from, any action that is, or reasonably may be determined, as contrary to the Global Code of Conduct. I understand that a breach of the Code of Conduct can lead to disciplinary action up to and including dismissal.

The full Code of Conduct is available on Box and from the Trócaire/HR focal point.

Signed: _____
Print Name: _____
Date: _____

Employees are to return this page to their HR Focal Point. All other Trócaire Representatives are to return to their Trócaire Focal Point.