

Insecurity Insight Policies

Code of Conduct

30 July 2021

Amended version of Policies of April 2019

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Preamble

Insecurity Insight was established to advance research methods to examine threats facing people who live and work in dangerous environments, and to disseminate insight about the causes and dynamics of insecurity among aid workers, aid agencies and those concerned with the protection of health care, education, internally displaced persons, refugees, and those affected by disasters.

Insecurity Insight honours its founders' values by requiring the highest ethical standards of its board, its members, managers, advisors and consultants so as to allow Insecurity Insight to pursue its mission.

Insecurity Insight's policies are intended to provide guidance on expected standards in research ethics, how to deal with risk and to ensure that decisions are not influenced by self-interest and generally ensure integrity and the highest ethical standards in its daily operations and conduct. Insecurity Insight's policies give advice and guidance on best practice to be followed.

Insecurity Insight policies consist of a series of interlinked policies:

- A statement on equality and diversity
- Anti Fraud, Bribery and Corruption Policy
- Conflict of Interest Policy
- Data Protection Policy
- Procurement Policy
- Research Integrity Policy
- Risk Management Policy
- Safeguarding Policy
- Travel and Subsistent Policy

These policies are followed by the Implementation and Enforcement Practices available upon request specifically the

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- Financial Policies and Procedures ("Standing Financial Instructions")
- Procurement Policies and Procedures ("Standing Procurement Instructions")

1. Statement on Equality and Diversity

Valuing individuals with different cultures, perspectives, and experiences is at the heart of Insecurity Insight's mission. Insecurity Insight welcomes members, managers, advisors and consultants regardless of their background and aims to make best use of their talents, experience, and perspectives. Insecurity Insight seeks to develop a work environment where we treat each other with respect, fairly and in a consistent way.

2. Anti Fraud, Bribery and Corruption Policy

Statement on Anti-Fraud, Bribery and Corruption Policy

Insecurity Insight complies with applicable Swiss law and the laws of the countries in which it operates. Insecurity Insight takes a zero-tolerance position with respect to fraud and corruption and prohibits corruption in any form, directly or indirectly. Insecurity Insight is committed to its donors, partners and contractors, and to adhering to the highest standards of probity and accountability in the use of its funding. This is ensured through governance, internal and external controls and risk management practices.

Insecurity Insight shall take all possible actions to protect from reprisals individuals who reveal or help to reveal corrupt or fraudulent practices in Insecurity Insight projects or grants and individuals, as well as individuals and entities subject to unfair or malicious allegations (Whistle blowing).

Anti-Corruption Principles

Insecurity Insight prohibits all forms of corruption, and in particular but not limited to the following.

Bribery and Facilitation Payments

- The offering, promising and granting to any person or organization, including government agencies, officials, private companies and employees of private companies, of an undue advantage for one's own benefit or for the benefit of a third party.
- Accepting, demanding or expecting from any person or organization, including government agencies, officials, private companies and employees of private companies, an undue advantage for oneself or for a third party.
- Facilitation payments that are made to expedite bureaucratic procedures or other business arrangements that have been paid for but not delivered.

Gifts, Hospitality and Expenses

Insecurity Insight recognizes that fostering good relationships with partners and stakeholders is important to its continued success. The provision and receipt of modest gifts and entertainment, and the incurring of modest expenses, are acceptable in principle, provided that they are reasonable and transparent. The following should be considered as guidelines.

- Insecurity Insight prohibits the offering or accepting of gifts beyond those commonly given to speakers following a contribution to a panel or public discussion.
- Insecurity Insight prohibits the offering or accepting of hospitality not directly related to work activities.
- Insecurity Insight permits the acceptance of work-related hospitality provided that it does not imply a possible influence on the accomplishment or outcome of projects or business relationships. Meals, hotel accommodation and flights are permitted when offered to facilitate the participation in work-related meetings.

Members of the association are required to use their good judgment before accepting a gift or hospitality. The local context of countries and hospitality/courtesy conventions where Insecurity Insight is operating should be considered when applying this Policy.

3. Conflicts of Interest Policy

Statement Conflict of Interest Policy

Insecurity Insight expects the highest ethical standards of its board, members, managers, advisors and consultants to always seek to uphold the principles to ensure that decisions are not influenced by self-interest. This policy is intended to provide guidance on how to deal appropriately with situations that involve, or may appear to involve, conflicts of interest.

Insecurity Insight is a membership association of professionals and has thus always benefited from the involvement of a range of professionals with close associations with other similar bodies or who hold different employment status elsewhere. As Insecurity Insight does not have employees, Insecurity Insight's members will have other associations.

This policy describes how decisions involving these and similar situations should be dealt with to ensure the integrity of the process. Its basic purpose is to avoid both

the reality and the perception that its board, its members, managers, advisors and consultants have used their positions to derive inappropriate financial, personal or institutional benefits, and it should be interpreted and applied to achieve this purpose.

The association is committed to the highest levels of integrity. Members of the association are expected to conduct their relationships with each other, the association, and outside organizations with objectivity and honesty.

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Conflict of Interest Principles

Conflict of interest occurs when a member of the association has a private interest that prejudices the integrity and unbiased participation in the association. Private interests include any advantage to oneself or one's family, relatives, friends and persons or organizations with which one has or had business or political relations.

In order to assure impartial decision-making, it is the policy of Insecurity Insight that any conflicts of interest, or apparent or potential conflicts of interest, be fully disclosed before a decision is made on the matter involved, and that no member, project manager, or advisor participate (other than by providing information) in any decision in which he or she has a conflict of interest.

No member of Insecurity Insight will participate in any self-dealing transactions. It is the continued responsibility of all members, managers, advisors and consultants to review their outside business interests, philanthropic interests, personal interests, and family and other close relationships for actual, apparent, or potential conflicts of interest with respect to the Association, and to promptly disclose the nature of the interest or relationship.

This policy cannot describe all conflicts of interest situations that may arise involving the association. Therefore, members of the association must use good judgment to avoid any appearance of impropriety. Appropriate circumstances may also justify exceptions to the application of the policy.

Identification and Management of Conflict Situations

Generally, a conflict of interest may occur if an interest or activity influences or appears to influence the ability of an individual to exercise objectivity or impairs the individual's ability to perform his or her membership responsibilities in the best interests of the association.

An individual is considered to have a potential conflict of interest when:

- He or she or any member of his or her family may receive a financial or other significant benefit as a result of the individual's position at the association;



- The individual has the opportunity to influence the association's granting, business, administrative, or other material decisions in a manner that leads to personal gain or advantage; or
- The individual has an existing or potential financial or other significant interest which impairs or might appear to impair the individual's independence in the discharge of their responsibilities to the association.

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Specific Relationships that May Create Conflicts of Interest

A variety of situations, affiliations and relationships may create potential conflicts of interest. Financial or other relationships (i.e., board/officer or other management positions) by a member of the association or their family with a prospective or actual grantee, contractor, vendor or supplier could potentially create the appearance of impropriety and should be disclosed. When deciding what kind of relationships should be disclosed, consider the situation from the perspective of an outsider and whether the relationship is of such a nature that it could raise an allegation of an apparent or actual conflict of interest, and then err on the side of transparency, as disclosure helps to alleviate or avoid future misunderstandings and impropriety.

Disclosure and Management of Conflicts of Interest

Should an appearance of impropriety or actual conflict of interest exist, appropriate actions must be taken, which will vary depending upon the particular facts. Any conflict of interest should be declared using the conflict of interest declaration form (Appendix C to Procurement Policy and Procedures.) The member involved in the conflict situation must work cooperatively with their board to achieve a resolution of the conflict issues in the best interests of the association, as requested by the association. This may include the individual not taking part in the decision-making of a particular issue.

Fees, Expense Reimbursements, and other Similar Payments by the Association

Insecurity Insight does not pay any fees for the activities rendered by its members on behalf of the association unless these are activities specified in a specific project for which funding has been obtained from an outside body. If there are activities that are included in a third party-funded project activity, a member may be given a consultancy contract to carry out these specific activities for a fee that corresponds to the amount of money agreed with an external donor for the specific activity. If this is the case, the member acts as a consultant for the association carrying out this specific activity for a specified duration. (See procurement of services for details).

Members Fees, Honorariums, Salaries from other bodies than Insecurity Insight

Members of the association are encouraged to undertake speaking engagements, serve on boards and write articles or other. Author's royalties, honorariums, and payments for published articles or speaking engagements that are the direct result

of activities carried out while under a consultancy contract for Insecurity Insight are to be donated to Insecurity Insight (Association Matching Gift Programme).

Author's royalties, honorariums, and payments for published articles or speaking engagements can be accepted by the member in a personal capacity if

- the materials prepared and all activities undertaken in connection with these activities are prepared or conducted on personal time that was not paid for by Insecurity Insight under a consultancy contract,
- the association financial resources are not utilized.

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However, use of the data or information generated by the association may be used by its members in speaking engagements or publications provided that Insecurity Insight is duly credited.

Political Activities

The association is non-political and partisan. Members of the association are free to engage in political activities in a personal capacity as long as they avoid creating confusion between a personal opinion or a representation of the association.

Self-dealing

Insecurity Insight will not lend money or other extension of credit to its members. Members may only lend money to the Insecurity Insight if the loan is interest free and the proceeds are used exclusively to advance Insecurity Insight's charitable purposes (see financial policy).

4. Data Protection Policy

Statement Data Protection Policy

Insecurity Insight regards the lawful and fair treatment of personal information as very important to its successful operations, and to maintaining confidence between our team and all those who use and access our services.

Data protection principles

Insecurity Insight complies with the EU General Data Protection Regulation (GDPR).

Data collection and its use

Insecurity does not and will never collect:

- personal data from people visiting its website, or our social media sites.

Subscription to the MailChimp run mailing lists requires users to provide an email address and any other information the user chooses to give such as a real or assumed name. This information is held by MailChimp and only includes information the user provided.

Insecurity Insight may use the data on the user habits of its subscribers to better understand which of Insecurity Insight's public services and products are most frequently opened or downloaded to help Insecurity Insight to monitor its impact and to improve the relevance of provided information for its users.

Insecurity Insight will not share this data outside of the organisation beyond the overall trends in the number of people using its publications as requested as impact indicator by donors

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Rights of individuals

Individuals may request:

- Right to be forgotten: Users may request the termination of data being held by Insecurity Insight at any time.
- Right to rectification: Users may request access to and update data at any time, in order to correct or complete personal information.
- Right of access: Insecurity Insight will provide further information to any individual requesting it.
- This policy will be made available to all users.

5. Procurement Policy

Statement Procurement Policy

Insecurity Insight is an association of members who have come together with a common purpose of improving and developing methodologies to conduct research and to enhance knowledge about people in danger. In so far as possible, members will contribute to the purpose of Insecurity Insight on a voluntary basis without expectations of a fee.

Insecurity Insight will, however, procure services from its members for the following activities that require a specific commitment to a task that exceeds the possibility of free services due to the rigour and time commitment required. These include but are not limited to:

- Managing projects and programmes to comply with donor regulations;
- Activities specified in donor-funded projects such as data entry, data cleaning, research, analysis, and production of publications;
- Information technology development and maintenance;
- Accounting related to donor funded projects;
- Activities that are deemed necessary for the legal and administrative obligations of the association;
- Key services such as server costs, subscriptions to key software etc.;

Insecurity Insight may pay members in the form of consultancy contracts to carry out specific activities Insecurity Insight is responsible for delivering as part of a donor funded project.

Procurement of Services Principles

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Insecurity Insight will work with members and other associations, organisations, individuals or companies when services are required to support the association in the implementation of specific donor projects. Such service contracts are rewarded on the basis of competence and interest to external individuals and members. Remuneration will be provided following a submission of the required service, a timesheet and invoice.

Insecurity Insight keeps contracts, time sheets and invoices for all payments made and makes them available for inspections to competent authorities if and as required.

Procurement of Goods Principles

Procurement shall be conducted in an impartial, transparent and accountable manner. In promoting transparency, information relating to procurement process shall be documented in a manner that facilitates appropriate scrutiny of procurement activities.

Procurement shall be conducted with the aim of obtaining value for money based on the following consideration:

- the direct and indirect costs of the goods;
- the quality and fitness for purpose of the goods to be procured;
- the proposed supply time-frame for the goods;
- the potential risks associated with the procurement of the goods

See Procurement Policy and Procedures and Standing Procurement Instructions for details.

6. Research Integrity Policy

Statement Research Integrity Policy

The purpose of Insecurity Insight is to advance research and new knowledge on insecurity for people living in dangerous environments. Insecurity Insight researchers are expected to be committed to high standards of professional conduct in the collaboration with partners and the use and management of external funding including their legislative requirements. All researchers and consultants working for

Insecurity Insight must conduct their activities in an ethical and professional manner, ensuring validity and accuracy in the collection and reporting of data.

Research Integrity principles

Insecurity Insight believes in our responsibility for research data. Data are stored, retained, accessed and disposed securely in accordance with all legal, statutory, ethical, contractual and funding. Our data management policy is part of our research practice and procedures, protection of intellectual property rights (IPR).

This policy aims to address the dual objectives of making insight from our data accessible to stakeholders, partners, the wider academic community and the public where possible whilst recognising that there are circumstances when access to research data must be restricted to protect the privacy of individuals, and the ability of aid agencies to operate safely in high risk environments.

Everyone working for Insecurity Insight and anyone with access to Insecurity Insight data must respect this policy.

Researchers are expected to comply with international standards of ethical research and data handling and protection procedures. Researchers are responsible for ensuring appropriate security for any confidential material to which they have access. Confidential information must only be used for the purpose for which it was collected. Researchers must maintain the confidentiality of any information to which they have been given access on a confidential basis. This includes ensuring secure storage for confidential information.

Authorship

Insecurity Insight publications are typically authored by Insecurity Insight. Longer publications will name individuals who contribute to the research. One or two page data overview documents will not mention individual contributors.

Storage

All significant research data must be stored in digital and computer-readable form. It will be stored securely in a durable format, with adequate metadata and/or documentation to facilitate identification and support effective reuse of research data, if and where appropriate. Data will be backed-up regularly.

Access

Insecurity Insight recognises the benefits of making research data accessible to the public or wider academic community. Before sharing data, it is essential to consider whether this is permissible in light of IPR ownership, ethical, privacy, confidentiality requirements or any legal, regulatory or funding restrictions. Access to research data that is deposited in the Repository may be restricted or embargoed by technical constraints.

Scientific Misconduct policy

Insecurity Insight condemns any form of dishonesty or misconduct in research and accepts responsibility for developing and maintaining the highest standards of intellectual integrity. A climate of intellectual honesty mandates that all members have an obligation to conduct research in a manner reflecting these principles.

Unacceptable conduct

Insecurity does not accept under any circumstances:

- Fabrication
- Falsification
- Plagiarism
- Misrepresentation
- Breach of ethical guidelines or duty of care for data providers

7. Risk Management Policy

Statement Risk Management Policy

Insecurity Insight recognises that there are risks involved in everything the association does and that it has a duty to manage these risks. This duty is to donors, the partners and collaborators and its members.

Risk management principles

Risk is part of everyday life. It can be defined as the chance that something will happen that has an impact upon aims and objectives. Risk management is as much about exploiting opportunities as it is about managing threats. Risk needs to be managed rather than avoided. Innovation requires a certain level of risk.

Risk assessment and risk identification

Risk cannot be eliminated but it can be reduced and better controlled through assessment, control actions, monitoring and review. Risk is assessed based on the likelihood of the risk occurring and the impact or severity of the consequences should it occur.

Risks are identified on an ongoing basis. Members and consultants have a duty to consider and discuss emerging risks with colleagues and partners.

The following areas of risk may apply to the work of Insecurity Insight:

- Non-compliance with statutory requirements or legislation – including, unawareness of legislative requirements and ignoring legislative requirements
- Non-compliance with donor requirement, policies or procedures – including, breaches to financial regulations or contract standing orders, non-compliance with donor policies or a failure to follow manuals, procedures and guides
- Disclosure of sensitive information – including, confidential data from partners, failure to notify when information has accidentally been made public, external attack on computer hardware/ software and errors or omissions affecting externally published material
- Insufficient resources – including, failing to obtain sufficient funding or late payments by donors or others, inability to recruit or maintain consultants, lack of computer or other technical resources
- Poor performance management – including failure to measure or meet project indicators, failure to benchmark costs and performance and failure to set achievable goals and targets.

8. Safeguarding Policy

Statement on Safeguarding

Insecurity Insight is committed to safeguarding those it works with from unintended harm. Insecurity Insight actively supports safeguarding policies in the aid sector by collecting information on experiences of sexual exploitation, abuse, harassment or bullying in the aid workplace. Insecurity Insight therefore expects the highest ethical standards of all its members in respecting the rights and wellbeing of those with whom or for whom we work.

Safeguarding Principles

Insecurity Insight will ensure to minimise the likelihood and potential negative impact of our work on those we work with. This requires:

- Adherence to our research standards (see research integrity policy)
- A focus on ‘do no harm’
- Awareness of the potential risks to those who report abuse or exploitation
- Integrity and transparency while protecting the privacy of those who report
- Every member has a responsibility for safeguarding (whistle blowing)

9. Travel and Subsistence Policy

Statement Travel and Subsistence Policy

The aim of the travel and substance policy is to clarify reimbursement procedures for legitimate expenses they may incur when travelling to advance the objectives of Insecurity Insight and describes how to arrange travel and accommodation.

Travel and subsistence principles

When required to undertake official travel, Insecurity Insight will pay for, or reimburse member's direct travel expenses. Insecurity Insight does not pay a standard per diem but reimburses expenses against receipt. Where no extra expense was incurred, no reimbursement is due.

Home-based / Permanent Place of Work

Insecurity Insight is a virtual organisation and does not provide workspace to its collaborators. 'Home-based' is used to identify the permanent place of work on the timesheet of any collaborator.

Official travel

Official travel is any travel required to undertake away from the home-based workplace on official business, including attendance at:

- a stakeholder office;
- a conference or other meeting directly related to II activities.

Official travel does not include:

- any private travel while on official travel.

Principles of booking travel and accommodation arrangements

The safety and wellbeing of our members is of utmost importance. Insecurity Insight considers the needs of members undertaking official travel and balances this against cost and best value for money.

Budget authorisation

All official travel must be charged to a particular project and included under the relevant budget. Budget authorisation should be obtained from the project manager before booking official travel.

Official travel should be kept to an absolute necessity and when other options (eg telephone or video conferencing) are not available or ineffective in achieving the goal.

To obtain the best value for money individuals must arrange journeys as economically as possible. Where possible, those booking official travel should take advantage of available cheaper fares.

Unless otherwise approved in advance, travel should be booked second class on rail systems and economy on flights, unless special offers allow the purchase of a first class or business class ticket at a comparable price to a second or economy class ticket.

Within cities, public transport should be used as much as possible. Taxis are permissible under particular circumstances such as time of day or other special circumstances such as when

- it is necessary for reasons of personal safety;
- travelling very early in the morning or late at night;
- transporting heavy luggage to or from a place of departure or arrival;
- the saving of official time is important; or
- there is no other suitable method of public transport.
- the use of ridesharing services will be decided on a country-by-country basis.

Taxi expenses are only reimbursed against receipt. Private vehicles should only be used in exceptional circumstances.

10. Implementation and enforcement of Insecurity Insight Policies

Statement Implementation and Enforcement of Insecurity Insight Policies

The most persuasive and effective method of preventing fraud, conflict of interest is the promotion of an ethical and transparent environment that encourages members of the association to adhere to Insecurity Insight's values and to actively participate in protecting the organization's reputation and resources through a culture of integrity and ethics.

Implementation and Enforcement Principles

Oversight and enforcement mechanisms are needed and sanctions have to be specified. Insecurity Insight is committed to consistently applying and enforcing its principles.

A culture of integrity and ethics

Insecurity Insight's culture of integrity and ethics involves:

- Insecurity Insight's Policies to which the board, members, managers, advisors and sign up when joining the association.
- Maintaining member's morale through positive and constructive engagement with each other.
- A listening culture that takes all members' concerns seriously and examines all allegations.

Regular reviews

Regular reviews of research standards are carried out on a regular and self-critical basis.

Regular reviews of procedures, policies and risks are carried out at the annual general meeting. At the AGM the following activities will be carried out:

- The membership considers a SWOT analysis on risks
- Data protection review

Oversight Process

As Insecurity Insight has non-hierarchical structure, all members, the board and the project managers are responsible for observing and reporting any concerns of policy breaches to others or individuals of their trust. Concerns and potential conflict of interest cases will be discussed, clarified and addressed in the appropriate form.

If it is alleged that fraud, financial or research misconduct has occurred, Insecurity Insight will examine the allegation and evaluate the evidence.

Depending against whom the allegations are made, it is either members of the board or others who are tasked with examining and evaluating the evidence and sharing the conclusions.

Those reporting the allegations should suffer no detriment for making allegations of misconduct in good faith (Whistle blowing).

Where the allegations are substantiated, appropriate sanctions are applied.

Genuine errors or differences in interpretation or judgments of data are not considered serious misconduct.

Possible actions or sanctions

Depending on the case the following action will be taken:

- external stakeholders (e.g. donors, those who provided data) are informed as appropriate.



- **Asset recovery:** where Insecurity Insight has suffered pecuniary loss or loss of other material assets, best efforts will be made to seek and obtain restitution from the individual(s) responsible for the corruption or fraud including taking legal action.
- **Fixing the problem:** where data confidentiality was breached the necessary measures will be taken to fix the leak.
- **Disciplinary Action:** Where an investigation reveals that a member or consultant of Insecurity Insight has committed fraud, appropriate disciplinary action will follow.
- **Follow-up action:** After each incident of fraud or corruption, an investigation will follow to identify what further safeguards would have to be put in place.

Insecurity Insight will take appropriate administrative actions against individuals when an allegation of misconduct has been substantiated. The actions may include:

- removal of the responsible person from the particular project;
- Removal of Insecurity Insight membership.

END 30 July 2021