REVIEW OF

COUNCIL FOR INTERNATIONAL DEVELOPMENT CODE OF CONDUCT

& PROPOSED RECOMMENDATIONS

COUNCIL *for*
INTERNATIONAL
DEVELOPMENT
NEW ZEALAND

CONTENTS

1. INTRODUCTION

The Council for International Development (CID) started researching international codes of conduct for International Non-Government Organisations (INGOs) in 2011. In 2013 CID drafted its own Code of Conduct ('the Code' or 'CID Code') based on the Australian Council for International Council (ACFID) Code. The ACFID Code was used as a template so as to ensure confidence within the CID membership, who were keen to use a compliance framework that was already regionally well-recognised. At the 2013 CID AGM it was decided to proceed with the CID Code on a trial basis with an initial group of members. It was eventually implemented wider following final approval at the 2014 CID AGM.

Since the CID Code was developed in 2014, it has occasionally gone through minor revisions in terms of wording or specific clauses. However it had not been comprehensively revised. At the time of its implementation in 2014, it was agreed that the Code would be reviewed after the 3-year mark to ensure its continued relevance, and to capture any insights and reflections at a point when the majority of CID members were projected to have gained Code Signatory Status (CSS).

At the 2018 CID AGM, two Code review workshops were held, with the intention to start capturing membership thoughts on how the framework for a review should be pitched. The perceived positives of the CID Code at that time included that it had worked as an opportunity for learning and the implementation of lessons in a structured way, and that it had built trust amongst stakeholders. The perceived negatives of the CID Code included that it made some organisations feel like they were trying to "*fit a square peg in a round hole*", that it focused too much on detail rather than principle, and that the compliance self-assessment process was too labour-intensive. Key priorities for the review of the CID Code were also discussed at the 2018 AGM CID workshops, and these were eventually incorporated into the CID Code review scope and Terms of Reference.

At the beginning of 2019 the first group of CID members had attained CSS, representing over 95% of CIDs current membership. 2019 also saw a growing awareness across CID membership of the value of having sector-wide agreed and clearly stated standards for behaviour, transparency and accountability. The belief that the CID Code was of critical value was also shared by Ministry of Foreign Affairs and Trade (MFAT) who partly fund the CID Code. The CID Code had functioned well in terms of articulating expected standard, such as management of funds and coordination with other actors (etc.), but also in terms of burgeoning issues such the localisation agenda, but also safeguarding and the protection of vulnerable people. As such, the review also provided a focus upon the utility of the CID Code for addressing risk relating to standards not being protected, and the impacts upon the sector should its reputation be questioned.

It is expected that implementation of any recommended and approved revisions of the CID Code of Conduct would start to come into effect mid-2020.

2. GUIDING PRINCIPLES & BENEFITS OF THE RECOMMENDATIONS

CID has utilised the following principles during the review of the CID Code. These principles were derived from initial consultation on the review, and the subsequent terms of reference, including the review objectives and purpose.

Pending approval and implementation of the recommendations, the new CID Code would:

- maintain its reputation with a stronger sense of ownership by CID membership,
- enhance confidence and accountability for all stakeholders,
- continue to champion updated standards of good practice for the development sector, including emergency response,
- maintain its integrity while becoming more resource efficient in regards to compliance self-assessment requirements,
- be more responsive to CID membership requirements for complaints-handling,
- be more succinct and communicable,
- be better positioned for promotion within organisations and across the development sector,
- be more reflective of topical issues such as safeguarding and localisation,
- be more inclusive of explicit monitoring and evaluation recommendations,
- be better aligned and reflective of other international standards, like Core Humanitarian Standards, the Global Standard for CSA Accountability, and frameworks such as the Sustainable Development Goals), and
- enable greater engagement with a broader range of organisations and actors.

3. RESEARCH & CONSULTATION

Informed by the key priorities discussed at the 2018 AGM CID workshops, the scope of the CID Code review was further developed at the start of 2019. The review terms of reference for the CID Code review went through a number of subsequent alliterations from April to June 2019 as it was reviewed by the CID staff, the Code Review Reference Group, the CID Board, and the CID Code of Conduct Committee.

The CID Code review begun in May 2019, and was undertaken by the CID Standards & Humanitarian Manager with support of the wider CID team. The Code of Conduct Committee (CCC) decided that that sub-committee would stay independent of the CID Code review, but be kept up to date on the progress of the review and included as a key focus group during data collection and consultations.

A reference group was established to provide independent support to the reviewer, and served as a group of independent experts to:

- Provide objective guidance on aspects of the review
- Confirm the identification of appropriate stakeholders
- Support the reviewer in the event of any queries.

The Reference Group met on three occasions (July, August and November 2019), and was made up of four individuals as follows:
   a. Sharon Bell – Circuit International
   b. Andrew Johnston – Save the Children
   c. Sophie Seck – ACFID
   d. Junior Ulu – independent

A stakeholder identification process was undertaken in May 2019, and this included:

- Current Members (full and associate)
- Potential members who have shown interest and/or withdrawn
- MFAT & other relevant government departments
- Fundraising Institute of New Zealand (FINZ), and Charity Services (and other regulatory bodies)
- CID Board
- CID Code of Conduct Committee (CID sub-committee)
- CID staff
- ACFID & Pacific Islands Association of Non-Governmental Organisations (PIANGO)

The dimensions of the CID Code review were tripartite; content, process and substantiation, with the pitch of the focus as follows:

- Content of the CID Code (relevancy; quality; length; depth)
  - *Is there anything that should be added/ removed/amended from the current version of the CID Code?*
  - *How does it, or should it, diverge from the ACFID Code, and how do we rationalise this difference?*
  - *What aspects of the CID Code might also be relevant to other categories of CID membership?*
  - *How might the CID Code be utilised further, i.e. as an accreditation document for the purpose of MFAT partnership funding models?*

- Process (interface with CID; duration; depth; time)
  - *Is there any way that the CID Code support/ engagement between CID and its membership can be strengthened?*
  - *Are CID's processes for handling issues or complaints sufficient?*
  - *Is CID sufficiently linked to regulatory bodies and oversight organisations who handle formal complaints?*

- Substantiation (appropriateness; quality; relevancy)
  - *Can the process of compliance assessment and verification be made more efficient while ensuring ongoing integrity?*
  - *How does CID substantiate the best practice within the CID Code, particularly if it was to be used as a mark of quality?*

The initial timeline for the CID Code review was for it to be completed by September 2019 and shared as part of the October 2019 CID AGM papers. However more time was required for the completion to enable the flexibility required for follow up with key stakeholders during data collation. This also allowed for a fuller analysis and mapping of the CID Code against other standards such as the Core Humanitarian Standards, etc. In September 2019, the Board agreed to a revised timeline for the CID Code review to be completed by the end of 2019.

4. CONTEXT & FEEDBACK

Since the CID Code was implemented in 2014, only one full member of CID had not gain full code signatory status. However verification of organizational compliance with the CID Code across the broad sweep of CID's membership (at almost 100%), along with discussions well integrated into their discussions with stakeholders and partners, as well as day to day considerations of their work.

Towards the end of 2018, the New Zealand Government also announced the Pacific Reset and challenged the New Zealand INGO development sector along with MFAT to "do things differently", so as to deliver improved sustainable development impact in the Pacific and beyond. In response to this, MFAT undertook a review of its partnership mechanisms, including aspects of its due diligence requirements.

MFAT sees the CID Code as crucial for raising awareness and encouraging best practice and accountability within the New Zealand international development sector. The CID Code is noted by MFAT as a voluntary, sector self-regulated code of good practice. It should also be noted that the Code compliance self-assessment system also includes a robust process to ensuring substantiation and verification of policy, including feedback to the submitting organisation. MFAT describes their own due diligence is a rigorous evidence-based process, which seeks to provide the Government and New Zealand taxpayers with the reassurance that organisations receiving funding have been objectively and independently verified as meeting key criteria. MFAT views their own due diligence framework and that of the CID Code as complementary.

MFAT state that being signatory to the CID Code provides an additional source of verification for various domains within the Manaaki due diligence process, but being a Code signatory is not a mandatory requirement. The Code is only referenced as a possible additional source of verification within the Manaaki due diligence process. This is to ensure that Manaaki is widely accessible to a diverse range of New Zealand-based NGOs. MFAT have stated that if any NGO receiving Manaaki funding was not a CID member or Code signatory, they would encourage them to consider joining CID and becoming Code compliant.   However, for their Negotiated Partnerships mechanism, there is an expectation that organisations engaging in MFATs Negotiated Partnerships *will* be members of CID and are signatories to, or working to become signatories to, the CID Code.

Some CID members felt this still represented a duplication of some aspects of the CID Code compliance process. However other members view the CID Code and the MFAT due diligence as two different but equally important purposes, with both mutually supporting the broader accountability and due diligence expectations. Discussions continue as to how the CID Code can be more aligned with the internal

processes of MFAT in order to further support, streamline and strengthen any partnership accreditation process for all CID members[1].

In gaining a further snapshot of CID member perception of the context or positionality of the Code, the following (verbatim) feedback was received in October 2018.

PERCEIVED NEGATIVES

"There is not a clarity of purpose regarding the rationale for the CID Code, including the role and relationship in regards to supporting partnership with MFAT, particular in terms of supporting due diligence."

"The Code as it is currently practiced in some regards creates a 'dominance over a partner', particularly in regards to the complaints-handling process. There is an issue with CID acting, or at least being perceived, as a regulatory body."

"Assessing some of our organizational requirements against the Code requirements still feels like trying to "*fit a square peg in a round hole*". It focused too much on details rather than the principle as a whole."

"The Code needs to be promoted within the public, as it still seems to be internally-focused and only known within the sector; there needs to be greater currency within the public perception of being a Code signatory."

"There needs to be more clarity regarding the reach of the Code when working with local partners, including how do we engage with our partners on Code compliance issues or obligations, and who is responsible for breaches by partners, etc."

"There are still some gaps in the scope of the Code, such as health, safety and security of staff."

"There are likely gaps in the monitoring of Code implementation once an organisation has Code signatory status."

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[1] Please refer to the relationship between the ACFID Code and the DFAT partnerships due diligence process referenced on page 12.

PERCEIVED POSITIVES

"The Code encourages transparency, accountability and equality across the sector."

"There has been a mature level of flexibility in how CID engages with partners on the Code, particularly the recognition that the size and complexity of the organisations matters. CID has allowed a range of responses from organisations in the compliance narrative, understanding that compliance is not just a 'yes/ no' response but a progression, or journey involving incremental development and alliterative steps."

"The CID Code and the compliance self-assessment process is a great opportunity for learning and to implement lessons in a structured way, and to enhance organisational and staff professionalism. It has also served well as a framework for inducting new staff into an organisation or sector."

"The Code and the compliance self-assessment process has been really critical for many organisations to identify areas that were lacking and exposing gaps. This has really helped with driving good-practice going forward that is based on international experience, and test an organisations against these benchmarks."

"The Code has allowed organisations to identify other opportunities for funding, and to be able to apply for funding with a greater-level of confidence and assurance to donors. The CID Code is building trust amongst stakeholders including MFAT, and it demonstrates the sectors deep consideration of these things."

Qualitative data, in the form of responses to a standardized list of questions was collected from a number of identified stakeholders between June and November 2019. The list of questions which informed the online survey, and research engagement with both stakeholders and focus groups is included as *Annex 1 – Steering questions utilised in the Code Review.* While some contradictory feedback eventuated in some of the detail, consistent and strong responses in the feedback were identified across eight key aspects of the review as follows:

CONTENT & SCOPE OF THE CID CODE

There was a desire to strengthen issues such as safeguarding and child protection within the CID Code, along with ensuring current requirements such as environmental protections were further supported, particularly in regards to a climate change adaptation. The need to reference the localisation Agenda was also mentioned, however it was acknowledged that this does not necessarily apply across all organisations. Strengthening requirements as per the Health and Safety at Work Act 2015 was also suggested.

There was almost unanimous support for a greater focus on putting policy into practice, specifically for due diligence processes and safeguarding. It was noted that CID oversight is difficult for obligations like recruitment or harassment, but some respondents wanted a more explicit definition of human resources expectations as it relates to safeguarding and Duty of Care for their own staff.

Member organisations rated the CID Code well for acting as a reference tool for best practice and in ensuring organisations stay compliant with other legal and organisational requirements.

USER-FRIENDLINESS & EXPERIENCE

Respondents seemed to either think the compliance self-assessment and substantiation requirements of the CID Code were between 'just right' and 'too much work'. There was almost unanimous support for moving the format of the CID Code away from a writeable PDF, to an online/ web-based platform. This could then include the ability for members to simply fill out check boxes or upload documents for certain areas (for example governance which requires low substantiation beyond provision of a Constitution).

More flexibility on how different members operate individually would also be appreciated by members. For example, rather than recommending and substantiating specific policy requirements, members could illustrate how various outcomes are produced.

SECTOR ACCOUNTABILITY & COMPLIANTS-HANDLING

Many of the organisations that responded to the question sections on accountability and complaints-handling wanted engagement with the CID Code to go beyond simply complying at the self-assessment stage. For many organisations, complaints and accountability requirements don't provide a value-add other than as an external check of processes and they felt there should be a greater ability to demonstrate compliance with internal policies. Many suggested that this could be improved by simply making CID's complaint-handling processes clearer or more explicit. One organisation suggested something akin to Worksafe's Health and Safety procedures.

PERFORMANCE AGAINST STATED OBJECTIVES

Generally, all organisations felt that the Code was meeting the stated objectives, although these could be strengthened in how the Code influences the relationship and accountability with partners. It was noted that the Code does acknowledge local partners and this was born from a genuine desire to improve their best practice as well.

VALUE OF CODE TO MEMBER ORGANISATIONS

The current application of the CID Code in supporting performance, strength, and longevity of member organisations was rated poorly, as was internal organisational awareness of the Code. It was noted that while the Code itself is a valuable mechanism for accountability and transparency, the utility of this would be further strengthen by insuring greater awareness of the Code within the public and governmental stakeholder community. To increase membership and improve engagement, selling the benefits of the Code and aligning with MFAT were the two main suggestions.

PROMOTION OF CODE & POSITIONING IN THE SECTOR

When asked about the idea of a 'Code-lite' for potential social enterprises, academia, and private sector members, respondents suggested much/ or all of the Code should still apply. Greater engagement between members on the Code , the strengthening of reassessment processes (such as the triennial resubmission), and selling the Code to the public better were suggested as key to greater promotion and positioning of the Code in the sector.

ALIGNMENT OF THE CODE WITH OTHER STANDARDS

It was felt by a majority of respondents that the Code should be well aligned with other relevant standards, such as the Core Humanitarian Standards, and the Global Standards for CSO (Civil Society Organisation) Accountability.

Respondent did however, suggest that they felt the main overlap and perceived duplication with other key standards might be with MFAT's due diligence standards. There were suggestions from several members that MFAT's due diligence should be replaced by the CID Code, or at minimum, better aligned with the Code to reduce overlap and duplication of regulatory requirements.

CODE & ACCREDITATION

There was a broad consensus that the Code does not have as high credibility among some stakeholders (i.e. the public) as it could or should. Some felt that any lack of credibility may be due to a lack of awareness, but that this might also be due to key aspects of the Code already covered in part by other key accreditors (i.e. FINZ and the Charities Commission).

In Australia, being a signatory to the ACFID Code is a pre-requisite for an NGO applying for accreditation with DFAT's ANCP program (Australia NGO Cooperation Programme). This is the largest bucket of funding provided to international development through NGO's. Only NGO's accredited to DFAT can receive funding through this mechanism (57 out of 125 members are accredited agencies).

To be considered for accreditation, DFAT undertakes an intense and robust accreditation process, measuring NGO's against criteria. This can include a 3-day office review of documents. The DFAT accreditation process will not start or progress unless the NGO is an ACFID member.

ACFID believe that there are 2 different principles involved in this process, so it does not involve a duplication of a due-diligence process (in that way that some CID members articulated they experience in New Zealand). ACFID believe it is not a duplication because:

- The ACFID Code works on self-assessment, and they can only assess what a member tells them (apart from some limited policy verification and website review).
- DFAT don't work on self-assessment, they verify and audit and check, as they want to see evidence for everything; they speak to their implementing partners directly, they 'test; the partners understanding of their policy, etc.

ACFID view their Code compliance as a first step that an NGO takes, as a stock take of potential alignment, before applying for DFAT accreditation. Likewise DFAT uses the ACFID Code as a filter to ensure the organisation should already have a good and solid approach to good practice.

ACFID believe that there are many similarities between the ANCP criteria and their Code criteria, and intend to undertake a mapping exercise in early 2020. CID will remain in contact with ACFID to understand the findings of this mapping.

5. SAFEGUARDING & PSEAH IN THE REVIEW OF THE ACFID CODE

There was a clear focus that the review of the CID Code should be undertaken in line with strengthened expectations from issues such as Safeguarding and Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH). In early 2018, ACFID launched their review into PSEA[2], and the implications of this for their own Code. This has been invaluable in understanding how the CID Code might have similar incorporations.

The ACFID review was informed by a report from Learning4Development which reviewed ACFID Code of Conduct and Quality Assurance Framework to ensure it addressed standards in relation to the protection of partners and communities from sexual exploitation.

Despite the recognition of the ACFID Code's strong existing standards, specifically in relation to child protection and safeguarding, a number of areas were found where their Code could be strengthened to enhance its ability to lift practice in the broader safeguarding of vulnerable people, including:

1. Staff and volunteers must clearly understand that sexual exploitation, abuse or harassment in any form is unacceptable,
2. Our primary stakeholder, the communities where we work, and affected populations should know the standard of behavior expected of staff and volunteers in this regard,
3. The communities where signatory organisations work must have an accessible, gender and culturally sensitive, and confidential means of making a complaint of sexual exploitation or abuse, and
4. Organisations must have an established incident reporting and good management systems that specify investigation procedures for sensitive investigations such as allegations of sexual exploitation and abuse.

The second part of ACFID's PSEA review was a specific focus on the ACFID Code to understand where it could be improved to better equip ACFID's members to safeguard against sexual exploitation and abuse. ACFID created an additional ***Commitment 1.5 We advance the safeguarding of those who are vulnerable to sexual exploitation and abuse*** which requires members to demonstrate their organizational commitment to PSEAH.

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[2] A note on the use of PSEAH rather than PSEA. ACFID grappled with whether to include 'Harassment' in this acronym. ACFID excluded this as their Code already required signatory organisations to have an Anti-Harassment (including sexual) & Bullying Policy (or coverage in other policy). This is not the case at CID.

The subsequent changes to their ACFID Quality Assurance Framework in relation to PSEAH were designed to strengthen member practice (if implemented correctly), while not creating an unnecessary compliance burden. These included:

- **New Compliance Indicators**:
    - Members to demonstrate their organizational commitment to the prevention of sexual exploitation and abuse, through a survivor-centred approach.
    - Members governing body is informed of and responds to serious incidents in accordance with their mandate and responsibilities.

- **New Compliance Verifiers** to enabling stakeholders to make complaints to the organisation in a safe and confidential manner:
    - outlines a triage system for escalating serious incidents
    - outlines a referral process for complaints that do not fall within the scope of the policy. *(e.g. Complaints that do not fall within the scope of the policy would include, for example, complaints against an employee of another organisation or government department.)*
    - commits to providing appropriate assistance and referrals to survivors *(e.g. providing assistance to complainants might include medical, social, legal and financial assistance, or referrals to such services.)*
    - A documented investigation procedure, which stipulates that an organisational record must be kept of all misconduct complaints, noting the ability to de-identify complaints at the request of the complainant or survivor,

- …and to support primary stakeholder communication:
    - Information is provided to primary stakeholders on the expected behaviour of the organisation's staff and volunteers, and access to its local complaints mechanism.

- A number of **Compliance Verifiers were also revised** or expanded, typically the addition of wording to broaden design and planning to consider dynamics that lead to safeguarding issues:
    - …and an analysis of power dynamics including issues of gender equality and equity.
    - …and prevention of sexual exploitation, abuse and harassment.

- A number of **new Good Practice Indicators**, including:
    - Members work with staff, partners and communities to challenge attitudes which permit or excuse sexual misconduct both internally and within organisational program activities.
    - *Members seek out gender and safeguarding expertise as desirable skills and experience when recruiting new persons to the governing body.*
    - *Pre-deployment training covers scenario-based discussions about power imbalances, status and workplace cultures of the destination country and how these impact work and personal relationships.*

The ACFID Code is now structured differently to the CID Code, and ACFID members need to understand and apply the two key components of the Code:

- **The ACFID Code of Conduct**: the 9 Principles and 33 Commitments that lay out the standard of practice to which ACFID Members commit.
- **The Quality Assurance Framework**: a separate but linked document that details the Compliance Indicators, Verifiers and Good Practice Indicators for each of the Principles and Commitments of the Code.

The finalisation of proposed changes to the ACFID Code were delayed so that they could align with those of DFAT's requirements as practically as possible. DFAT at the time were still drafting their policy of PSEA. The updated Quality Assurance Framework took effect on 1st July 2019.

Oxfam project in Bangladesh (credit: Kelsey-Rae Taylor)

6. RECOMMENDED CHANGES TO THE CID CODE OF CONDUCT & ITS MANAGEMENT

Code Aspect	Review Feedback	Options	Recommendations
PSEAH & SAFEGUARDING *Related Principles/ Obligations* *B.1.4 Addressing gender* *D.5.2 Professional Conduct* *D.5.1 Human Resources* *D.5.2 Professional conduct* *D.6.2 Accessibility and awareness*	Requirements/guidelines on recruitment needed and should reflect PSEAH. Organisations should be required to provide staff and new recruits with all relevant information and policies on their rights and obligations in terms of PSEAH, and health and safety. Complaints processes should be set up so that they are focused on the needs of the complainant and protect confidentiality. The current CID Code does not mention 'Harassment' or 'Bullying'. The need to address this was articulated in the feedback. A note on the use of PSEAH rather than PSEA. ACFID grappled with whether to include 'Harassment' in this acronym. ACFID excluded this as their Code already required signatory organisations to have an Anti-Harassment (including sexual) & Bullying Policy (or coverage in other policy). This is not the case at CID.	Code can provide more guidance on how organisations can demonstrate their commitment to preventing sexual exploitation and abuse as part of their compliance framework. Also include specific references to PSEAH in the complaints-handling process. A template for a PSEAH policy that describes the standard of behaviour for organisation's staff and representatives, specifically prohibiting sexual exploitation and abuse could be provided. This could outline how the policy is implemented throughout the organisation, including how it fits in with the notification of complaints. Potential appointment and notification of a PSEAH focal person if this is different from the complaints-handling contact point. Human resource processes could reflect more specifically how aspects such as recruitment will	1. Signatory organisations should have a specific PSEAH Policy and/ or an Anti-Harassment & Bullying Policy, and this should cover expectations of partners. 2. Substantiation for compliance should support recruitment processes that include inquiries about work history and attitude towards PSEAH, and PSEAH should be referenced in all job descriptions. 3. Code Implementation and Reference Guide should provide guidance on how to support PSEAH (for example for recruitment, minimum of two reference checks with at least one a recent employer/manager). 4. Substantiation for compliance should ensure organisational personnel are provided with induction information that outlines their rights and outlines how to access policies and procedures relating to the PSEAH, as well as all other matters

		have a stronger focus on PSEA including:	relating to Occupational Health and Safety.
		7. Assess all positions for the level of risk to vulnerable people. Applicants for positions working directly with vulnerable people should be subject to the highest level of screening. 8. Guidance on how to confirm the identity and work history of applicants could be included. How to do reference checks and who with? 9. Guidance on targeted questions to ask of applicants during interviews that explore their attitudes towards PSEAH. 10. Check appropriate professional registers. 11. Require all appointees to read and sign your PSEAH policy, code of conduct and complaints policy. 12. Check criminal and police records for all your preferred candidates. Another option is to extend mandatory principles, such as B.3.4	5. Processes for registering complaints or raising concerns in regards to PSEAH, should take into account protection, dignity, confidentiality and the needs of the complainant, survivors, or those that have experienced PSEA. There needs to be inclusion of reference to PSEAH and associated concepts under CID Code definitions (see Annex). 6. The CID Code should include additional wording re. "context analysis, and an analysis of power dynamics, including issues of gender equality and equity" or similar, at key related obligations.

		Protection of Children, to also encapsulate wider safeguarding issues, or issues that relate to the relationship between vulnerability and exploitation.	
DUE DILIGENCE ***Related Principles/ Obligations*** *B.1.1 Accountability to primary stakeholders* *B.2.2 Clarity in roles and responsibilities*	Level of due diligence is already quite strong across signatory organisations, and this was evident in much of the feedback, however it is interesting that the term due diligence was not mentioned once in the wording of the CID Code. CID Code as a due diligence mechanism could be further supported through a simplified guidance document for signatory organisations to use. ACFID now has a 6-page A5 booklet of guidelines. Feedback varied on the relation between CID Code due diligence, and MFAT due diligence mechanisms, between those that felt it was a duplication and those that felt it was in fact 2 different things. Reluctance for anything like 'spot-checks' on due diligence, which would disempowering and undermining of the high-level of	There may need to be a greater level of documented assessment process in the compliance self-assessment, but this could be based around provision of what signatory organisations are already doing. Agreements re. due diligence, particularly in regards to partner expectations, would not necessarily need to be bureaucratic and may take whatever form both parties feel will address this needs. There would also need to be further work on exploring and understanding, and 'closing the gap' potentially, between how CID and MFAT both define due diligence.	1. Substantiation for compliance should include verification of some form of due diligence process and capacity assessments of partner organisations with whom signatory organisations work with. 2. A new obligation should be included under *B.2.2 Clarity in Roles and Responsibilities* (with partners) that make more explicit signatory organisation expectations for due diligence with partners, in regards to things such as: • Alignment with Members' values and objectives. • Governance and legal registration. • Financial systems. • Reference checks of partners against prohibited entities listings. • Health & Safety. • Capacity assessment for implementation of key safeguarding and risk policies

	trust evident within the membership. Some feedback suggested that the triennial reassessment is working well in this regard. ACFID does not think there is any duplication in the 2 processes covered by them vs. the DFAT cooperation mechanism with NGOs. At ACFID, signatory to their Code is a pre-requisite for an ACFID member applying for DFAT accreditation. Only NGO's accredited by DFAT can receive funding through the DFAT *Australian NGO Cooperation Progra*m mechanism. To be considered for accreditation, DFAT undertake an intense and robust accreditation process, measuring that NGO's against their own criteria - this includes most often a 3-day office review. But accreditation process will not start or progress unless the NGO is an ACFID member.	There has been some discussion regarding a 'light-touch' annual re-certification process to support a greater level of interim due diligence. This could be a very light-touch on any additional compliance processing for signatory organisations, but rather be based on signatory organisations meeting criteria (to be identified further) such as attendance at CID Code related workshops, webinars, etc.	(e.g. child protection and prevention of sexual exploitation, abuse and harassment). 3. An ***annual 'health-check'*** process should be considered to support communication on ongoing capacity strengthening processes, including due diligence.
LOCALISATION	Localisation, along with general came up significantly in the CID Code review.	There is a need for a more concentrated and genuine engagement with local partners to ensure that development and other responses truly empower	1. The preamble for the entire Code should be redrafted to be more inclusive of current language in regards to concepts such as localisation.

Related Principles/ Obligations *B.2.1 Mutual respect and support* *B.2.2 Clarity in roles and responsibilities* *B.2.3 Control of funds and resources*	The CID Code needs to speak more clearly towards a more concentrated and genuine engagement with local partners to ensure that development and other responses truly empower local partners and build the capacity of their systems. As a standardized part of the work that INGOs undertake, this is a typical practice and well captured in the current Code, however feedback suggested that there is a desire to see localisation to be made more explicit. Reference to the impact of Climate Change in the Pacific also came up in discussions in regards to localization.	local partners and build the capacity of their systems. This is typical practice and well captured in the current Code, however feedback suggested that there is a desire to see localization to be made more explicit.	2. The statement under *Section B.2 Relationships With Partners* should be rewritten along the lines of the below suggestion: *Partners are individuals, groups of people or organisations that collaborate with signatory organisations to achieve mutually agreed objectives in aid and development activities, particularly as informed by the Localisation Agenda. Partners may include affiliates. Signatory organisations' commitment to Te Tiriti o Waitangi runs throughout the Code as a living example of respect for equality in partnership, both in Aotearoa New Zealand and overseas.* 3. There should be reference to localisation and associated concepts under CID Code definitions (see Annex). 4. *Any reference to Environment (although the entire CID Code), and particularly in relationship to understanding partner context) should be expanded to mention terminology such as:*

			• *Environmental Stewardship & Sustainability* • *Climate Action, etc.*
MONITORING & EVALUATION (& RESEARCH & LEARNING) ***Related Principles/ Obligations*** *B.1.1 Accountability to primary stakeholders* *B.1.2 Quality Approach* *B.1.4 Addressing Gender*	While some felt doing Monitoring & Evaluation "*through the Code is too difficult*", some stakeholders felt that the CID Code substantively and successfully supported their respective capacity to undertaken Monitoring & Evaluation, and that signatory organisations were undertaking this to a satisfactorily level. However, there was some that felt that the CID Code was in fact lacking around the need to have truly robust Monitoring & Evaluation mechanisms in place, particularly in regards to ensuring 'feedback loops' where lessons, as well as research, could be incorporated into future activities. Addition some felt that the Code could include a greater level of explicit reference to how lessons learnt/ evaluation outcomes are managed and shared across the wider organisation. In ACFID's review of their Code, Monitoring & Evaluation	In looking at options for strengthening Monitoring & Evaluation, there are a number of options, including wider reference to Monitoring & Evaluation and/ or clearer guidance and criteria for substantiation. There might not be a need for substantive changes to CID Code wording but Monitoring and Evaluation could be referenced in a greater range thematic focus throughout the Code (currently it is only mentioned in reference to addressing gender). The wording could be as follows: *…Signatory organisations will ensure that an appropriate focus is given to understanding and addressing _____ in their aid and development programme design, implementation, and monitoring and evaluation cycles.* This could be supported by clearer guidance on signatory organisations on how to	1. Consideration should be given to expanding any wording referencing Monitoring & Evaluation to also include Research & Learning, i.e. MERL. This should include strengthening of obligations that link this to critical analysis and organisational strengthening. 2. There should be greater reference to monitoring and evaluation obligations across the wider CID Code, and this should be further applied to: • Environmental sustainability • Human Rights • Disability and inclusion • Advocacy • Emergency Management 3. To better reinforce monitoring and evaluation, the provision of documentation (tools, templates, processes, frameworks, check lists, etc.) as part of compliance substantiation should be widened and also made more specific.

	requirements did not change, other than the strengthening of documentation requirements for compliance substantiation.	substantiate a deeper-level of Monitoring & Evaluation (as part of their compliance self-assessment). This should make explicit how Monitoring & Evaluation, and management of information and results, is shared across the entire organisation.	4. There should be reference to Monitoring and Evaluation under CID Code definitions (see Annex).
TRANSPARENCY *Related Principles/ Obligations* *C.1.1 Transparency (marketing & reporting)* *C.2.1 Transparency (annual reporting)*	The 2017 review of the ACFID code argued for a more explicit reference and wider inclusion of transparency for their amendments to the Code. ACFID have also established a new requirement (their compliance indicator 7.3.1) which requires an additional level of documentation to support a greater level of transparency, including a new requirement to ensure signatory organisations have a Transparency Policy, and this is available on a signatory organisations website.	Transparency is referred to in the preamble of the CID Code, but very little reference in the body of the Code. This is understandable, given that the whole mechanism is about accountability and transparency, but an option will be to make this more explicit in external communications with stakeholders.	1. Signatory organisations should be required to have a specific Transparency Policy, or statement on transparency. 2. The policy or statement regarding transparency should be made further available on the signatory organisations website, if not already. 3. If not already on their websites, signatory organisations should be encouraged to wider the range of policy documentation relating to transparency on their website, including: • Complaints • Governance • Child Protection • PSEAH • Donor Promise

REFERENCE TO OTHER INTERNATIONAL STANDARDS & GUIDELINES ***Related Principles/ Obligations*** *B.5.1 International Standards*	In terms of international standards and guidelines, reference to the Core Humanitarian Standards (CHS) came up a lot in the feedback. CHS is not mentioned in the current version of the CID Code, or the implementation reference guide. A number of International Codes, particularly those that relate to the humanitarian and aid context, are most clearly reference in relation to compliance with B.5 Emergency Management. Overwhelmingly, feedback stipulated that the CID Code needs to be updated to include greater reference to not only CHS, but also *The Sphere Humanitarian Charter* (which incorporate the CHS), but also the *Global Standard for CSO Accountability*, but also initiatives such as: • *Joint Standards Initiative (JSI)*, • *Humanitarian Quality Assurance Initiative (HQAI)*, and • *International Aid Transparency Initiative (ATI).* Feedback also included some discussions regarding the place for reference to the *Sustainable*	Compliance with B.5 Emergency Management currently requires the incorporation of the principles of the Code of Conduct for the International Red Cross and Red Crescent Movement and NGOs in Disaster Relief, as well as adherence to the Sphere Humanitarian Charter, as well as consideration for various IASC (Inter-Agency Standing Committee) charters. The option available is to update B.5 Emergency Management specifically in regards to Codes that now frame humanitarian work in 2019. Additionally, given aspects of these Code are wider than just emergency response, reference to them in the CID Code preamble (along with the SDGs, etc.) is also an option.	1. There should be consideration for redrafting section *B.5.1 International Standards* to update it on a fuller and updated range of International standards and guidelines. 2. The CID Code should make reference to the Sustainable Development Goals in the preamble, particularly in regards to how the Code works to strengthen signatory organisation activities towards the attainment of the SDGs. 3. There should be consideration for aligning the revised CID Code with the Global Standard, noting that in order to understand how potential alignment can be reached, or the implication for the CID Code, a mapping exercise between the 2 sets of standards would need to be undertaken. 4. There should also be consideration for ensuring that the Implementation & Reference Guide also mentions updates for the New Zealand legal context (such as Anti-Money Laundering and Countering Financing of Terrorism Act 2009).

	Development Goals in the CID Code.		

COMPLAINTS-HANDLING PROCESSES
 	
Related Principles/ Obligations
 	
D.6.1 Value of complaints
 	
D.6.2 Accessibility and awareness
 	
E.3.1 Agreement to the process
	There was not as fuller and robust feedback in regards to the Complaints-Handling mechanism as we initially thought there would be.
	
	Feedback was otherwise quite diverse however. One signatory organisations wanted engagement on Complaints-Handling to go beyond simply complying with the Code (with no further clarification), while others felt that Complaints-Handling did not current add any value-add other than checking on process, or that it was still unclear what that process was.
	
	The way that the CID Code referred to Complaints-Handling across two sections was also confusing for some.
	
	There was a clear indication that signatory organisations wanted to better understand through the Code how Complaints-Handling process was integrated with concerns or complaints raised outside of New Zealand.
		Consideration could be given for redrafting the Code, and NOT splitting reference to Complaints-Handling across 2 sections (D.6 AND E.3). Additionally Section E could be shortened so the statement of compliance is not duplicated.
		
		The initial review of any complaints received by CID will be immediately triaged to ensure it is;
		  a. Referred to signatory organisation (if not already received by them),
		  b. Referred to other agency (such as Fundraising Institute of New Zealand) if not related to breach of CID Code, or
		  c. Appointed to investigating officer (if related to breach of CID Code).
		
		CID, or its Code of Conduct sub-committee, could undertake a review to understand if there are any further gaps within the Complaints-Handling process, including communication and
			1. CID Code should provide a greater level of guidance in regards to current best practice across the full extent of the Complaints-Handling mechanism, including that which is expected from government donors.
			
			2. CID Code guidance will include clear reference to the triaging of complaints, including exceptions, so that forwarded complaints are dealt with effectively and with minimum duplication, while respecting the autonomy of the signatory organisation.
			
			3. Reference to management of complaints should reference the role of external agencies (i.e. Police, etc.) if relevant.
			
			4. Process for any complaints referred to CID should remain independent of CID, CID Board and the signatory organisation. The review of complaint-handling process should be conducted by independent Code of Conduct Committee member or its co-opted special expert.

| | | strengthening of clarity regarding criteria for CID engagement.

The complaint-handling process should remain independent of the CID Board and the signatory organisation, and be conducted (on behalf of CID) by a member of the Code of Conduct Committee, or someone with the required expertise as co-opted by the Code of Conduct Committee. The reception of all Complaints-Handling queries will remain with the Code Manager, and restricted to Code of Conduct Committee access, under their Information Management & Confidentiality Policy. | 5. Key obligations relating to complaint-handling should include additional wording re. "survivor-centred approach" or something similar. |
|---|---|---|---|
| **USER FRIENDLY COMPLIANCE SELF-ASSESSMENT** | Respondents either thought the CID Code required either too much work, or was about right. It was recognised that while the process needs to be challenging, this should be expected to maintain a high-standard of compliance, but this would become easier as NGOs revisited self-assessments over time.

The content of the CID Code itself is needed to assess integrity, but | CID could consider the moving of the compliance self-assessment process online, including the ability to submit documents electronically through the same portal.

Consideration could be made for a more 'objective' compliance verification process, through the request for specific types of policy. Although this might present issues in that it supports larger organisations who already have formal processes in place, but | 1. CID should explore ways to move the compliance self-assessment process online.

2. Greater support and coordination should be given to ensuring a 'buddy-system' during the compliance self-assessment process whereas bigger organisations can support smaller organisations to strengthen their frameworks. |

	wording could be simplified for clarity. There were significant suggestions that it should move away from its current writable PDF form, to a web-based platform or something similar. The need for comments for all obligations was also questioned, particularly those that were supporting more objective obligations (i.e. 'yes' or 'no' response). Flexibility within the CID Code, which would allow smaller organisation, associate members, or private sector partners to complete a 'less-onerous' version of the Code was also mooted. The creation of a 'Code-lite' for other categories of member was also suggested in the feedback from Associate Members	might add a barrier to smaller organisation who often prefer to discuss in a narrative how they are compliant. Some stakeholders felt that there might be some challenges with indicating any level of flexibility on certain CID Code requirements, so that it might be 'filtered' and applied further to associate members, private sector, social enterprises. There might be some challenges with indicating any level of flexibility on certain CID Code requirements. Additionally, options for what to include in a Code-lite, etc. might be complicated by the idea that very little in the Code is 'negotiable' or less critical (mandatory obligation or not).	3. CID should scope out, with the support of the Code of Compliance Committee, the viability of a 'Code-lite' or Code-related Checklist for other categories of membership, but also understand how this might further support organisations that might have a more singular focus (such as advocacy activities only).
PROMOTION & POSITIONING OF THE CODE	Many stakeholders would like to see a greater and immediate benefit of having a CID Code 'quality-mark' tick; to ensure any of the cost/ burden to them is worth the trouble.	There has been work already undertaken in regards to the promotion of the Code. Including how this needs to fit under a wider CID Communications strategy, and be supported not just by the Code of Conduct Committee, but also	1. The Code Promotion Strategy, as supported by the wider CID Communications strategy should be strengthened to ensure the value-add of the revised CID Code is communicated to all

A higher profile for the Code would increase perceived benefits, and help bring other organisations into full CID membership. New CID members want to pre-emptively understand the benefits of the CID Code, with stakeholder feedback indicating a well-promoted Code will create all sorts of leverage. Associate members and others want to further understand the benefits of the CID Code, and do see it as a worthy aspiration. The leverage that CID can gain from having a high profile Code will be understood through organisations wanting to be part of Code's 'good guy club'. Through ACFID's review of their code, they are changed the way that they talk about 'partial' or 'non' compliance, and this has had some intentional benefits with how the public view their Code and their membership. It will be key for CID to draw from their experience.	signatory members themselves, the CID Board, and other CID work-streams. One of the challenges CID will need to address will be the capacity to implement many of the promotional activities, but will can be supported by the promotional strategy looking at low cost/ low resource options as a first step. Another option is to strategically look at how the conversation around the utility of the CID Code can be continued and supported in discussion with MFAT, particularly as their partnership mechanisms are reviewed in future.	stakeholders, and the wider public. 2. A 'Quality-Mark' should be scoped and established for the CID Code, with wider application that just a 'Code tick' (that has been utilised in the past). 3. Additional collateral and content should be developed to support promotion and education about the CID Code, including 'Spot-light' on the Code, and creation of other Communications material. 4. A focus discussion on the CID Code as a GFA funded mechanism should be prioritized with key senior MFAT staff, and include the CCC Chair.

7. NEXT STEPS

The CID Code Framework (December 2017) states, in support of transparency and accountability, the following guidance for approving any Code amendments:

- Changes in the Code will only be made in consultation with signatory organisations and will be approved at the AGM.

It is noted that amendments to the ACFID Code also requires the approval of their Council, which means approval at an ACFID AGM. When ACFID added the Commitment 1.5 in response to the safeguarding and PSEA, it went for endorsement at their November (2018) AGM.

The proposed recommendations outlined in this report were provided to the CID Board on the 19th November, and approved (pending minor edits) by the CID Board on 26th November.

These proposed recommendations have since been provided to the Code of Conduct Committee for their consideration. The Code Committee will be meeting again on the 11th February 2020. CID will seek approval on the recommendations from the Code Committee at that time, including discussion on next steps to get approval from CID membership, and how any potential changes to the CID Code should subsequently be implemented.

As such, there are a number of next steps that are yet to be determined, and which will be discussed at the next Code Committee meeting. These considerations are:

- If approved recommendations are to be endorsed prior to the next CID AGM (date still to be confirm, but typically October), then a Special General Meeting needs to be proposed and scheduled,
- Scheduling of implementation of approved recommendations, and
- Transitional arrangements to bring current Code compliant members up to date on any new obligations

ALIGNMENT OF THE CODE WITH THE GLOBAL STANDARD FOR CSO ACCOUNTABILITY

There is an opportunity for CID to be a part of a regional assembly of likeminded civil society groups to map and further align its Code to the Global Standard. Working in collaboration with ACFID and PIANGO, this work may start in March/ April 2020.

Reference to this project is noted as a potential recommendation under 'Reference to other International Standards & Guidelines' as follows:

There should be consideration for aligning the revised CID Code with the Global Standard, noting that in order to understand how potential alignment can be reached, or the implication for the CID Code, a mapping exercise between the 2 sets of standards would need to be undertaken.

AMENDMENT OF CODE AS REFERENCED IN THE CID CONSTITUTION

Given that CID is about to embark on a review of the Constitution, it will also be valuable to consider if there needs to be inclusion of wording in the Constitution to further clarify amendments to the CID Code. ACFID have recently added such information to their constitution. Consideration of wording similar to that in the ACFID Constitution (as below) will be inputted in to the CID Constitutional review, as follows:

Amendment of Code

13.5   *The Code of Conduct may not be amended or replaced unless:*

(a)   *the procedure for amendment of these Rules in accordance with Rule 15 is followed; and*

(b)   *any additional procedures which may be set out in these Rules or the Code of Conduct for amendment of the Code of Conduct are followed.*

13.6   *All Code of Conduct signatories must be informed in writing of any amendment to the Code of Conduct within sixty (60) days of an amendment being made and must be provided with a copy of the amendment and any such amendment does not apply to the signatory until they have been informed.*

8. ANNEX 1 – STEERING QUESTIONS UTILISED IN THE CODE REVIEW

A. CID Code content and scope:
- The current purpose and objectives of the Code are to improve development outcomes, increase stakeholder trust, and serve as a guide to good practice and risk management. How important are these objectives of the Code to your organisation? *1.Not at all 2.A little important 3.Important 4.Very important*
- Please state any change to purpose or additional objectives which you believe should be in place.
- Please outline in what way you currently use the Code to improve your work with local partners.
- Please outline in what way the Code could be used to influence the organisational capacity of local partners.
- Please list and outline any current or topical issues which are not currently represented in the Code, but which you believe should be.
- Please outline in what way programme delivery functions (e.g. monitoring and evaluation) can be better served by the Code?
- Do you think the Code should include requirements to further impact organisational culture? If yes, please explain.
- Do you think the Code should include a focus on transferring policy into practice? If yes, please explain.
- Please outline any additional recommendations you have to increase the Code's alignment to your organisation.
- Do you think the Code is appropriately named? Do you have other suggestions, e.g. code of practice? Why?

B. User-friendliness and experience:
- Do you think the compliance self-assessment process needs to be less detailed, or more detailed? If yes, please explain.
- Please outline, in what way the Code compliance self-assessment process could be simplified while still maintaining integrity.
- Given the nature, size and complexity of your organisation, how appropriate is the Code compliance self-assessment process? *1. Not at all 2.A little appropriate 3.Appropriate 4.Highly appropriate*
- Is there a need to strengthen the partnership approach (between CID and members) in implementing the Code? If so, how could this be achieved?
- Please outline what changes can be made to the Code to further empower CID members doing the compliance process.
- Please outline in what way the Code could be applied differently to accommodate a greater range of approaches to partnership (e.g. with members' implementing partners or business partners).

C. Sector accountability and complaints-handling:
- Please outline any concerns your organisation has with the current complaints-handling process. What changes would you like to see?
- How does the Code enable your organisation to strengthen and demonstrate accountability, and how could it be improved?

D. Performance against its stated objectives:
- How well do you think the Code meets its purpose and objectives? *1.Not at all 2.A little 3.Well 4.Very well*
- Please outline what you think is the biggest key strength of the Code.
- Please outline what you think are the key limitations of the Code.
- Please outline what recommendations you have for enabling the Code to be more effective.

E. Value of CID Code to member organisations:
- Please outline in what way the application of the Code adds value to your organisation.
- How would you rate the application of the Code in supporting best practice within your organisation? *1.Poor 2.Adequate 3.Good 4.Excellent*
- How would you rate the application of the Code in supporting performance of your organisation? *1.Poor 2.Adequate 3.Good 4.Excellent*
- How would you rate the application of the Code in supporting the strength and longevity of your organisation? 1.Poor 2.Adequate 3.Good 4.Excellent

F. Promotion of the Code and role in positioning the sector:
- How would you rate your organisation's awareness of the purpose and objectives of the Code? *1.Poor 2.Adequate 3.Good 4.Excellent*
- Do you think it is important for the Code to be promoted outside of the sector? If yes, in what ways do you think this could be achieved?
- Please outline what aspects of the Code might be relevant to CID's Associated Members (e.g. social enterprises, academia, and private businesses)?
- Please outline in what way the uptake of the Code could be increased by stakeholders other than our direct members (e.g. implementing and business partners)?

G. Alignment of the CID Code with other standards & other regulatory bodies:

- Please outline any other accreditations or Codes which your organisation has, or is required to hold.
- Do you perceive the Code to duplicate accreditation or compliance with other national sector or industry Codes? If yes, please explain.
- Please explain how well you think the Code aligns or compliments other Codes, standards or guidelines, and in what way you think the Code conflicts with other Codes, standards or guidelines.

- In comparing the Code to other standards, how well do you think it reflects the requirements of the New Zealand development sector? *1. Not at all 2.A little 3.Quite well 4.Very well*
- Are you aware of any other external changes influencing your organisation that the Code needs to reflect?

H. CID Code and accreditation:
- Please outline in what way does/could the Code be used to support accreditation, or as a 'Quality Mark' for donors, such as MFAT.
- What should the purpose, or role, of the Code be in strengthening partnership with MFAT?
- How should ongoing compliance with the Code be monitored after an organisation has become a signatory?
- In what ways does being a signatory to the CID Code provide assurance to donors and/or other stakeholders?
- In what way would you like to see the CID Code used within MFAT's partnership requirements?
- How effective is the Code at providing evidence of indicators of qualities (value, strength, credibility, integrity, sustainability, effectiveness, efficiency) to other stakeholders?

I. Additional questions
- What are the links with DFAT? How do they use the code?
- Do you know of any other mandatory code of conducts?
- Given that not all ACFID Code signatories are members, tell us about that?
- How do you promote the code?
- What were the key learnings of your last Code review at ACFID?
- Did you make changes? What were they?
- Other questions? (Re. promotion of Code inside and outside sector, etc.)

9. ANNEX 2 - DEFINITIONS

While the full scope of additional definitions is still to be determined, CID believes that the new CID Code should also include the following additional definitions:

Monitoring & Evaluation Monitoring and evaluation are systems or processes used to manage and assess the progress and results of their work. They are conducted in order to provide accountability to affected stakeholders and donors, to improve performance, to enable learning and adaptation, and to communicate information about results and impact. **Monitoring** refers to the continuous or ongoing assessment of work over time**. Evaluation** is the periodic assessment at a specific point in time (Sharpening the Development Process: A Practical Guide to Monitoring and Evaluation, INTRAC Praxis Guide No. 1).

Sexual exploitation "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." (UN Secretary-General's Bulletin on protection from sexual exploitation and abuse (PSEA) (ST/SGB/2003/13))

Sexual abuse "actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions." (UN Secretary General's Bulletin on protection from sexual exploitation and abuse (PSEA) (ST/SGB/2003/13))

Sexual harassment unwanted physical, verbal or non-verbal conduct of a sexual nature in the workplace that can include indecent remarks or sexual demands.

Staff: Any person who works for or represents an organisation whether or not she/he is compensated monetarily.

Serious Incident: An adverse event, whether actual or alleged, which results in or risks significant harm to a Members' work, beneficiaries or reputation; loss of Members' money or assets, damage to a Member's property, significant reputational damage to CID, a CID Member, the MFAT Aid program, or the CID Code of Conduct.

Oxfam project in Thailand (credit: Artur Francisco)

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