

REVISION & FINALISATION: CID CODE OF CONDUCT REVIEW RECOMMENDATIONS

Over the last 10 months, the proposed recommendations outlined in the full [2019 Review of the CID Code of Conduct](#) have undergone a review/ approval process by the CID Code of Conduct Committee and the CID Board. The revised and condensed version of these recommendations are outlined below.

The recommendations that were put forward within the 2019 review, were provided to the CID Board, and approved (pending minor edits) on 26th November 2019. These were then provided to the Code of Conduct Committee for further consideration.

On the 11th February 2020 committee had their first opportunity to collectively discuss and provide feedback on the recommendations as outlined and proposed within the Code Review report, as well as the feedback from the CID Board. Pending a single further amendment, the Code Committee revisions were accepted by the CID Board on the 26th February 2020, with this amendment finalised on the 1st September 2020.

As outlined in the CID Code Framework (December 2017) states, in support of transparency and accountability changes in the Code will only be made in consultation with signatory organisations, to be approved at the next AGM (5th November 2020).

Code Aspect	Current wording of recommendation
Due Diligence	<p>An annual 'health-check' process should be considered to support communication on ongoing capacity strengthening processes, including due diligence.</p> <p>The Code (and its guidance) should ensure that substantiation for compliance) should require verification that CID members are in dialogue with their partner organisations about due diligence. As part of all agreements, contracts, etc., CID members need to be clear with partners about their expectations regarding due diligence, while acknowledging that the work of each partner agency is also informed by their own values, cultural practices and norms. The partner needs to be able to verify how they identify challenges and problems in regards to due diligence, and how they address and respond to those challenges.</p> <p>Substantiation of their due diligence process needs to be provided, through a record of the conversation, and the provision of relevant documentation, checklists, etc.</p> <p>Due diligence should be considered in regards to things such as:</p> <ul style="list-style-type: none"> • Alignment with Members' values and objectives. • Governance and legal registration. Financial systems. • Reference checks of partners against prohibited entities listings.

	<ul style="list-style-type: none"> • Health & Safety. • Capacity assessment for implementation of key safeguarding and risk policies (e.g. child protection and prevention of sexual exploitation, abuse and harassment).
User Friendly Compliance Self-Assessment	CID should explore ways to move the compliance self-assessment process online.
	In discussions regarding the diversification of membership, CID needs to consider how some principles within the Code might be managed accordingly (i.e. what obligation might potentially be made negotiable, or be considered not be exemptible). Additional consider needs to be made on how the implementation of the Code might further support organisations that have a more singular focus (such as advocacy activities only).
	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.
PSEAH & Safeguarding	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.
	Signatory organisations should have a specific PSEAH Policy and/ or an Anti-Harassment & Bullying Policy, and this should cover expectations of partners.
	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.
	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).
	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 relating to Occupational Health & Safety.
	There needs to be inclusion of reference to PSEAH and associated concepts under CID Code definitions.
	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.
Monitoring & Evaluation (& Research & Learning)	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.
	There should be greater reference to monitoring and evaluation obligations across the wider CID Code, and this should be further applied to: <ul style="list-style-type: none"> • <i>Environmental sustainability/ <u>climate change</u></i> • <i>Human Rights</i> • <i>Disability and inclusion</i> • <i>Advocacy</i>

	<ul style="list-style-type: none"> • <i>Emergency Management</i>
	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.
	There should be reference to Monitoring and Evaluation under CID Code definitions.
Transparency	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: <ul style="list-style-type: none"> • Complaints • Governance • Child Protection • PSEAH • Donor Promise
	Signatory organisations should be required to have a specific Transparency Policy, or statement on transparency.
	The policy or statement regarding transparency should be made further available on the signatory organisations website, if not already.
Reference to other International Standards	There should be consideration for aligning the revised CID Code with the other International Standards such as the Global Standard for CSO Accountability and the Core Humanitarian Standards, noting that in order to understand how potential alignment can be reached, or the implication for the CID Code, a mapping exercise between the 3 sets of standards would need to be undertaken.
	The CID Code should make reference to the Sustainable Development Goals throughout the Code, particularly in regards to how the Code works to strengthen signatory organisation activities towards the attainment of the SDGs.
	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.
	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).
Complaints-Handling Process	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 how it also aligns with requirements from other stakeholders, (such as government donors for example).
	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.
	Reference to management of complaints should reference the role of external agencies (i.e. Police, etc.) if relevant.

	<p>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.</p> <p>Key obligations relating to complaint-handling should include additional wording re. “survivor-centred approach” or something similar.</p>
<p>Promotion & Positioning of the Code</p>	<p>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 stakeholders, and the wider public.</p>
	<p>A ‘Quality-Mark’ should be scoped and established for the CID Code, with wider application than just a ‘Code tick’ (that has been utilised in the past).</p>
	<p>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.</p>
	<p>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.</p>
<p>Localisation</p>	<p>The preamble for the entire Code should be redrafted to be more inclusive of current language in regards to concepts such as localisation.</p>
	<p>The statement under Section B.2 Relationships With Partners should be rewritten along the lines of the below suggestion:</p> <p>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.</p>
	<p>There should be reference to localisation and associated concepts under CID Code definitions.</p>
	<p>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:</p> <ul style="list-style-type: none"> • Environmental Stewardship & Sustainability • Climate Action, etc.

Date: 3rd September 2020