



# CODE OF ETHICS

JULY 2019

## INTRODUCTION

IntraHealth International is an independent nonprofit organization that aspires to a world where all people have the best possible opportunity for health and well-being. IntraHealth seeks to achieve this vision through empowering health workers to better serve communities in need around the world.

IntraHealth has a set of core values that guide our organizational culture, how we do business, and how we engage with our clients, stakeholders, partners, and donors. These core values are:

**Partnership:** We listen to and partner with diverse constituencies to codesign and implement locally relevant and sustainable results.

**Innovation:** We pioneer catalytic solutions, tools and technologies to address persistent and emerging health challenges. We seek and actively engage new and diverse voices, perspectives, and ways of working.

**Learning:** We learn from our experiences and adapt accordingly to elevate our organization's performance, value, and impact.

**Accountability:** We set ambitious goals and take ownership to deliver on commitments we undertake individually and collectively.

IntraHealth employees and members of the Board of Directors are committed to these values and to the highest principles of professional excellence and integrity in achieving our mission. IntraHealth expects its leaders to model ethical behavior and foster an ethical workplace culture.

The IntraHealth Code of Ethics articulates the ethical framework that guides all decision-making and action across the organization in alignment with our core values, vision, and mission. The Code is intended to raise awareness about ethical issues, offer clear guidance on expectations of ethical practice, and prevent problems. It sets forth standards that are required of all individuals working for or representing IntraHealth.

**Vision:** Everyone, everywhere has the health care they need to thrive.

**Mission:** To improve the performance of health workers and strengthen the systems in which they work.

All IntraHealth employees and members of the Board of Directors are required to acknowledge and adhere to the standards outlined in the Code of Ethics. We

also encourage our partners, suppliers and other individuals who represent us (interns, volunteers, and seconded staff members) to uphold the spirit of this Code as they work with us. To that end, the Code of Ethics is posted on IntraHealth's website.

The Code of Ethics is likewise available on the [IntraHealth Portal Policy Site](#). IntraHealth maintains comprehensive and practical organizational policies and procedures that offer further guidance on many of the standards included in this Code. In particular, 100 Ethics Policy, 100P Ethics Procedure and Code of Business Ethics and Conduct (COBEC) are intended to supplement and should be read together with this Code of Ethics.

## STANDARDS

### STANDARD 1: Compliance with all applicable laws, policies, and regulations

IntraHealth operates in countries around the world and with diverse government, corporate, and individual funding sources. IntraHealth expects its employees to comply with all applicable local, state, and federal laws, rules, and regulations in the respective countries where we work. IntraHealth employees and members of the Board of Directors must comply with the rules and requirements of all of our donors and funding sources as well as IntraHealth policies and procedures. When there is an apparent conflict among different laws, rules, or regulations and employees are uncertain of the course of action, employees should seek advice from their supervisors. We maintain updated, comprehensive, and clear policies and guidelines (tailored to a given country as required) and consistently monitor our activities for compliance with policy. Highlighted applicable laws and regulations are related to the following areas:

#### Safeguarding Children

IntraHealth prohibits employees from engaging in child abuse, exploitation, or neglect and maintains compliance with child welfare and protection legislation. IntraHealth promotes child-safe screening procedures and works to reduce the risk of child abuse, exploitation, or neglect, including unsupervised interactions with children, prohibiting exposure to pornography, and complying with laws and customs regarding the photographing, filming, or other image generating activities of children.

IntraHealth ensures that employees and others recognize child abuse, exploitation, or neglect and know how to report suspicious activity and/or overt violations.

#### Debarment, Suspension or Terrorist List Restrictions

It is IntraHealth's legal responsibility to comply with donor laws and statutes relating to debarment, suspension or terrorist restrictions. IntraHealth must commit and carry through with reasonable steps to ensure that we do not provide material support or resources to any individual or entity that commits, attempts to commit, advocates, facilitates, or participates in terrorist acts. We screen and conduct checks on entities and individuals to ensure that they are eligible to do business with our donors and have not been formally debarred, proposed for debarment, suspended, excluded, sanctioned or otherwise disqualified.

#### Human Trafficking

IntraHealth prohibits the use of forced, bonded or indentured labor, procurement of commercial sex acts, use of involuntary prison labor, slave labor, involuntary domestic servitude, forced child labor, child soldiers, child sex trafficking, or other trafficking of persons by Board members, officers, managers, employees, agents or consultants either in the performance of or during the period of U.S. government activities. Further, IntraHealth has no tolerance for abuse or sexual exploitation of project participants and clients committed by our employees and partners, and to responding seriously and appropriately to any such reports.

#### Corruption and Anti-Fraud

IntraHealth is subject to the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act of 2010 which prohibits giving anything of value to officials of foreign governments in order to obtain or retain business. IntraHealth's officers, managers, employees, agents, consultants or other representatives are not permitted to engage in bribery, kickbacks, payoffs or other corrupt business practices with foreign government officials.

**Associated Policies<sup>1</sup>:** 104 Safeguarding Children Policy; 105 Anti-Human Trafficking Policy

<sup>1</sup> All IntraHealth policies are incorporated in and made a part of this Code of Ethics, and compliance with such policies, as applicable, is required as part of compliance with this Code.

## STANDARD 2: Stewardship of financial resources

IntraHealth upholds the highest standards of stewardship of the financial resources entrusted to the organization, follows ethical business practices, and adheres to the accounting principles as set forth in the Generally Accepted Accounting Principles. IntraHealth's books, records, and accounts are complete and accurately reflect the true nature of the transactions they record, and IntraHealth employees and members of the Board of Directors honestly and accurately report all business transactions.

All funds that IntraHealth accept are used only for their intended purpose, and financial and other reporting (such as timekeeping) are accurate and complete. IntraHealth undertakes an annual external audit of financial statements reviewed and accepted by the Board of Directors.

**Fraud** is deliberately committed deception to secure something of value. Deception includes lying, asserting as fact something that is not known to be true, or concealing facts. Examples of fraud include false claims on expense reports, stealing, and accepting or giving kickbacks or bribes.

IntraHealth actively seeks to prevent and seek out fraud by establishing and monitoring robust systems of financial controls, conducting fraud prevention training programs, and maintaining a whistleblower mechanism. Employees who observe or see evidence of fraud are expected to report it.

**Associated Policies:** 101 Ethics Policy; 103 Anti-Fraud Policy the collection of accounting policies found on the policy site

## STANDARD 3: Fairness and impartiality in conducting business

As a good steward of its resources, IntraHealth applies fair, open, and impartial competitive processes and decision-making in its procurement, proposal development, purchasing, and hiring. Employees and members of the Board of Directors do not abuse their position with IntraHealth, organizational property, or information for improper personal gain.

All employees, members of the Board of Directors, and other representatives of the organization are expected to avoid activities that could give rise to potential conflicts of interest. Examples of potential conflicts of interest include engaging in paid activities outside of work, holding public office, and volunteering with organizations that could compete with IntraHealth for business. IntraHealth employees should avoid conflicts of interest that occur when their personal interests may interfere in any way with the best interests of the organization or the performance of their duties and responsibilities honestly, objectively, and effectively.

A **conflict of interest** occurs when an individual receives personal benefit, financial or otherwise, from her/his position in a manner that may inappropriately influence judgment, compromise the individual's ability to carry out her/his responsibilities, or could be a detriment to the organization's integrity.

IntraHealth employees must guard against situations where someone (e.g., a friend, spouse, family member, professional contact, co-worker, or supervisor) overtly or subtly attempts to unduly influence a decision that involves a contract or vendor decision. In addition, IntraHealth does not place or maintain an employee in a position that has a reporting relationship with a close relative nor does the organization allow employees to hire or contract close relatives for service to be performed on behalf of the organization.

Employees may give or receive occasional **gifts** of low monetary value at a rate of no more than US\$75 per gift-giver per year. Examples of these gifts may include local souvenirs, books, food, flowers, or an inexpensive meal.

IntraHealth employees do not offer or accept inducements as a gesture to influence a decision. Inducements may include cash, gratuities, hospitality, entertainment, travel and transportation, favors, contracts, or employment. IntraHealth employees are expected to pay particular attention to situations

involving government officials, the corporate sector, or nongovernmental organization representatives.

**Associated Policy:** 101 Ethics Policy

#### **STANDARD 4: Respect for diversity**

IntraHealth is a multicultural organization that appreciates and benefits from the diversity of its workforce. IntraHealth employees treat others with respect regardless of gender, gender identity, race, age, color, religion, language, disability, national origin, ethnic group or sexual orientation. IntraHealth promotes gender equality, nondiscrimination, and human rights in our organizational culture, behavior, and public image as well as in our programming approaches, products, and results. IntraHealth is committed to hiring a diverse workforce and honoring principles of equal opportunity employment.

**Associated Policies:** 700 Gender Policy; 102 Anti-Discrimination, Harassment and Retaliation Policy; Human Resources policies and handbooks

#### **STANDARD 5: Commitment to health and safety**

The health and safety of employees in the workplace is of utmost importance to IntraHealth. The organization is committed to educating, training, and motivating its employees to maintain a safe and healthy work environment for its employees, partner organizations, and others who visit our workplaces. IntraHealth expects employees to demonstrate personal responsibility and learn and abide by corporate safety plans and to actively contribute to a safe work environment free from violence, threats of violence, physical or verbal abuse, bullying, intimidation, or other disruptive behavior. IntraHealth is committed to promoting a healthy work-life balance for its employees and maintains drug and smoke-free work environments.

**Associated Policies:** 300 Safety and Security Policy; Country Safety and Security Plans; Country Employee Handbooks; 301 Disaster Preparedness, Business Continuity and Recovery Plan; US and Expatriate Human Resources Handbooks

#### **STANDARD 6: Protection of confidential and other sensitive information**

IntraHealth values, respects and protects the privacy of our employees, Board of Directors, clients, stakeholders, partners, and donors. Employees and members of the Board of Directors frequently have access to information that is confidential and proprietary to individuals (i.e., compensation and performance, contribution levels, and health status) and IntraHealth or other organizations (e.g., internal business decisions, competitive strategy, proposals, and data that belong to partners, donors, and governments). As such, they will safeguard and hold in confidence any sensitive and/or proprietary information, only disclosing such information to those who have a clear, professional need to know. We also require consultants and partners to sign nondisclosure and confidentiality agreements in order to work with IntraHealth. IntraHealth maintains robust data storage and back-up systems and policies that define how employees can safely and securely access, use, and store information.

**Associated Policy:** Privacy Policy; 1000 IT Computer and Network Policy

#### **STANDARD 7: Respect for and protection of intellectual assets**

IntraHealth recognizes and respects intellectual property rights and is committed to fulfilling IntraHealth's ethical and legal obligations with respect to the fair use of copyrighted materials. Employees are expected to protect IntraHealth's intellectual assets and may not infringe on the intellectual property rights of others (e.g., individuals, academic institutions, partners, donors, and corporations).

**Examples of Intellectual Assets:** Data, software, information, proposals, reports, programs, concepts, inventions, designs, methodologies, processes, tools, and products.

IntraHealth encourages wide dissemination, use, and modification of our technical products and materials for noncommercial purposes and with proper attribution to IntraHealth. At the same time, IntraHealth is committed to protecting those assets

that are associated most closely with our corporate brand (e.g., our corporate materials, trademark, and logo). All technical materials and products, including authored pieces, written or prepared on IntraHealth time and under an IntraHealth title, are considered the organization's intellectual property.

**Associated Policies:** Copyright and Trademark Policy; 901 Appropriate Use of Copyrighted Materials Policy; Authorship Guidelines

## STANDARD 8: Integrity in conducting global health research and programming

IntraHealth and its employees shall protect the welfare and rights of human subjects in research and other assessment activities and of clients and participants impacted by our program activities.

A **human subject** is an individual about whom an investigator obtains data through intervention or interaction, or identifiable private information through existing data sources.

For research, we do this through application of comprehensive human subjects' protection procedures that involve use of an institutional review board for human subjects' protection, meaningful assessment of risks/benefits for human subjects, and informed consent procedures. IntraHealth adheres to the human subjects' protection requirements according to US federal regulations, and as outlined by our own policy, donors, and regulations in the countries where we are conducting research.

IntraHealth safeguards the confidentiality and privacy of health workers, clients, and community members in the context of our routine monitoring, program assessments, training, and service delivery programs. IntraHealth also maintains formal informed consent procedures for specific health programs (e.g., informed choice for family planning counseling and services).

**Associated Policy:** 704 Human Subjects Protection Guidelines

## STANDARD 9: Accuracy, fairness, and honesty in communicating about our work

IntraHealth and its employees strive to produce and share complete and accurate information with donors, the professional global health community, the media, and the general public about our work, our accomplishments, and the results to which we contribute. IntraHealth is mindful of the breadth of effort it takes to achieve significant global health impact, does not overstate its own contribution, and acknowledges the contribution of others.

IntraHealth collects material from program stakeholders and beneficiaries for use in communicating about our work. When gathering and using such material, IntraHealth strives to inform the individuals of the possible uses of the material and to seek advance permission (either written or verbal) prior to use. When necessary, IntraHealth uses pseudonyms to protect a source's identity, privacy, and safety.

**Associated Policy:** 902 Photography Policy

## STANDARD 10: Stewardship of natural resources and the environment

IntraHealth is committed to reducing the impact of its operations on the environment and being cognizant of the impact its operations has on climate change. IntraHealth seeks to mitigate its environmental impact and create a work environment that reduces consumption and minimizes waste. Examples of environmentally sensitive practices include careful weighing of environmental costs against programmatic benefits of travel, recycling, reducing consumption of energy, water, and paper products, proper disposal of medical waste, computers, and other information technology tools, and being responsive to donor requirements associated with environment impact.

**Associated Policy:** 1100 Green Policy

## SUPPORTING ETHICAL PRACTICE

IntraHealth has an **ethics officer**. The ethics officer has the responsibility to develop, lead, and monitor a robust organizational ethics program. This program includes, at a minimum, the following:

- Employee orientation and on-going training and support on the Code and its related policies (this may include engaging employees across the organization as ethics point persons).
- Providing guidance when an employee is not clear what is expected in a specific situation.
- Systematic collection of information related to implementation of the Code (to include such items as employee perceptions and reporting on ethical concerns and how their concerns are addressed).
- Serving as the first line of response in investigating possible ethics violations.
- Liaison and on-going reporting to Human Resources, the Executive Team, and the Board of Directors.

## ETHICS VIOLATIONS

IntraHealth is committed to ethical practice across the organization and takes swift, fair, and appropriate action in response to violations of the Code. The consequence when an employee or Board Member violates the Code will be commensurate with the seriousness of the situation, and will involve the most senior individuals within the organization relevant to the given infraction. Violation of any of our standards and policies may result in disciplinary action that can include dismissal and/or legal action.

## REPORTING

Every employee and member of the Board of Directors has the responsibility to ask questions, seek guidance, report suspected violations, and express concerns regarding ethical practice. In situations where an employee is not certain about the ethical course of action or believes s/he has witnessed an unethical action, s/he should bring the situation to her/his supervisor's attention. Supervisors must promptly report any complaints received or observations of ethics violations to the ethics officer.

If an employee is not comfortable sharing the issue with her/his supervisor or is not satisfied with the supervisor's response, s/he is encouraged to directly contact the ethics officer. Staff concerns may be reported confidentially by contacting IntraHealth's ethics officer at [ethics@intrahealth.org](mailto:ethics@intrahealth.org) or via text at +1 (919) 260-2412. This email account and telephone number are monitored on a regular basis.

IntraHealth offers the anonymous IntegrityCounts service, provided through an independent third-party company to facilitate reporting and provide an unbiased and anonymous outlet when employees are not comfortable with IntraHealth's alternative reporting methods. IntegrityCounts provides several ways to report:

- **Web reporting page:** [www.integritycounts.ca/org/intrahealth](http://www.integritycounts.ca/org/intrahealth)
- **Email:** [intrahealth@integritycounts.ca](mailto:intrahealth@integritycounts.ca)
- **Fax:** 604-926-5668
- **Postal address:** PO Box 91880 West Vancouver BC V7V 4S4
- **Toll free and Collect Telephone numbers:**

### Toll Free Numbers:

North America:	1-866-921-6714
Indonesia:	PT Indosat 0018030208158 PT Telkom 0078030208158
Kenya:	0800-221-371
Uganda:	0800-113-215
Guatemala:	502-22786762

### Collect / Reverse Charge Number:

All other countries, including: Tajikistan, Bangladesh, Ethiopia, South Sudan, Tanzania, Namibia, Burkina Faso, Niger, Nigeria, Democratic Republic of the Congo, Mali, Senegal:  
Collect call: 1-604-922-5953

Anyone filing a complaint must be acting in good faith and have reasonable grounds for believing the information disclosed is an ethics violation.

## AMENDING AND UPDATING THE CODE

IntraHealth reserves the right to amend or alter this Code as it deems appropriate. The most current version of this Code can be found on the [IntraHealth Policies Portal](#).

This document is not an employment contract between IntraHealth and any of its employees or members of the Board of Directors.

## CONCLUSION

IntraHealth's core values of partnership, innovation, learning and accountability serve as the foundation of ethical practice within the organization. The Code of Ethics is designed as a guide for ethical decision-making for the organization, and not necessarily as exhaustive guidance for all the ethical issues that may arise. IntraHealth's reputation and ultimate success as an organization is derived from the day-to-day conduct of the individuals who work for and in other ways represent the organization. IntraHealth seeks to attract and retain individuals with high ethical standards. Employees and members of the Board of Directors are expected to act with good personal judgement and integrity to uphold these standards and serve as stewards of our good reputation and the core values we espouse.

## ACKNOWLEDGEMENT

Upon hire and annually thereafter, every IntraHealth employee and member of the Board of Directors must read and acknowledge that s/he will comply with IntraHealth's Code of Ethics and the related policies and procedures by signing the Code of Business Ethics and Conduct (COBEC). This acknowledgement ensures that we all carry out our responsibilities to the organization in compliance with shared values. IntraHealth employees have two ways (online or paper form) to sign the Code of Business Ethics and Conduct (COBEC).

## CONTACT

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Because Health Workers Save Lives.



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