

## **Albany Purpose and Values**

Albany's activities are underpinned by our values of Transparency, Integrity, Empathy, Innovation, Excellence and Resilience. These values are operationalised by our policies, procedures and the clear roles and responsibilities for our people. They also support delivery in line with the CSSF supplier code of conduct. They are of paramount importance with regard to communications: the use of information; ethical standards of engagement; and protection and compliance with an editorial policy, all require the consistent application of our values and strict adherence to the code of conduct. Examples of Albany's policies and procedures are as follows:

- Code of Ethics; Equal Opportunities Policy; Safeguarding Policy; Code of Conduct on Corruption
- Health and Safety Policy; Emergency Policy; Social Media Policy; Quality Policy
- Security Policy; Information Management Policy; Customer and Operations Processes
- Environmental Policy; Supplier Code of Conduct; Training Policy; Working Practice Policy
- Document Control Policy; Control of Records Policy; Management Review Policy
- Resource Management Policy; Purchasing, Budgets and Finance Procedures
- Service Provision and Project Management; Control of Equipment; Internal Auditing and Monitoring, Measurement and Improvement Policy

In recent years, this has been updated to reflect greater CSSF emphasis on Supplier Code of Conduct (namely General expectations for suppliers, Employees and Service Users, Business Practices and Standards of behavior), and the Civil Service Code of Conduct (namely Integrity, Honesty, Objectivity, and (Political) Impartiality). We have taken stock of the Chilcot Report also by requiring at least the Executive Summary to be read by all staff. Finally, we are also guided by the UN Global Compact Principles, which provides clear guidance on human rights in particular, in addition to our usual project policies on gender, conflict sensitivity Do No Harm principles, and safeguarding and sexual exploitation and abuse. This document will now look at some of the key areas of conduct.

## **Recruitment and Retention**

All employees, consultants, contractors and sub-contractors are briefed on these policies and procedures at the start of any project we undertake, and they are made continually available for reference. Ensuring that all adhere to a centralised set of policies and procedures creates a strong output, in terms of the use of information, communication protocols, ethical standards of engagement; the protection and compliance with company editorial policy. Where delivery falls short of the required standard, or where staff have any other cause for concern, a clear reporting process is in place through Albany line management, and ultimately to the project sponsor, in order to ensure issues are dealt with swiftly and appropriately. These policies inform each stage of the Albany programme cycle. To quality assure the professionalism and experience of our staff, part of our vetting process to accede to our consultant roster involves making clear certain bona fides before any scope of work is discussed: such as agreement to Codes of Conduct (which includes consideration on Gender, Do No Harm, Conflict Sensitivity), professional liability insurance, acceptance of Safeguarding and Modern Slavery principles. We also maintain an Equal Opportunities Policy. All of Albany's team members and individual consultants are aware of DFID's statement of priorities and expectations for suppliers.

## **Ethical Standards**

Albany will treat all colleagues, clients and all parties with whom we do business with respect, dignity, fairness and courtesy, acting in a socially responsible manner, within the laws, customs and traditions of the countries in which we operate. We will not be misguided by any desire for profitability that would negatively impact on our reputation, or that of our sponsors, and will only engage in practices that are legal and ethical. We aim to avoid conflicts of interest, and where they are identified, and we believe that the respective parties' interests can be properly safeguarded by the implementation of appropriate procedures, we will implement such procedures. When faced with difficult issues or issues that place Albany or others at risk, we actively encourage all employees and consultants to escalate concerns to line or project managers. Where business, operational, or other risks could be more appropriately managed by government, we will escalate as needed, taking care not to flow unreasonable levels of risk to subcontractors. By way of evidence of our commitment to this principle and Albany's management of risk, we have recently highlighted concerns over the capacity of a subcontractor to deliver against the aims of a CSSF project in Somalia, and worked closely with the Embassy both to find new partners and to ensure the project aims were delivered on time. Similarly, where a CSSF project has been delayed in Yemen due to a new management team in the beneficiary querying its value, we worked in close partnership with the relevant FCO desk officer to resolve the issue and work towards a resolution. We are all required to observe the highest standards of business and personal ethics in the conduct of our duties and responsibilities.

## **Safeguarding, SEA and Gender Equality**

At Albany it is vital that everyone who works for us maintains the highest standards of conduct, integrity and ethics, and complies with local legislation. If an employee, intern, consultant, contractor/partner or subcontractor has concerns about malpractice in the workplace, we wish to encourage them to communicate these through specific channels of communications without fear of reprisal, safe in the knowledge that they are protected from victimisation and dismissal.

Albany provides a safe and trusted environment which safeguards anyone the organisation has contact with, including beneficiaries, staff and volunteers; our organisational culture prioritises safeguarding, so that it is safe for those affected to come forward and to report incidents and concerns with the assurance that they will be handled sensitively and properly; we have adequate safeguarding policies, procedures and measures to protect people and these are shared

and understood; there is absolute clarity at Albany as to how incidents and allegations will be handled should they arise, including reporting to the relevant funding Department. Albany takes all reasonable steps to employ, train and promote employees on the basis of their experience, abilities and qualifications without regard to race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, gender reassignment, age, marital or civil partnership status or disability. We will also take all reasonable steps to provide a work environment in which all employees are treated with respect and dignity and that is free of harassment based upon an employee's race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, gender, age, marital or civil partnership status or disability. We will not condone any form of harassment, whether engaged in by employees or by outside third parties who do business with the Company. Such behaviour will result in the activation of the relevant protocol, with the potential repercussion being dismissal from the company.

### **Modern Slavery**

Modern slavery is a crime and a violation of fundamental human rights. Although we are not a commercial organisation as defined by Section 54 of the Modern Slavery Act (2015), we note that Modern slavery is constituted by the offences of 'slavery, servitude and forced or compulsory labour' and 'human trafficking'. Furthermore, we note that The Transparency in Supply Chains provision seeks to address the role of businesses in preventing modern slavery from occurring in their supply chains and organisations. As such, we agree with it and commit to upholding it. Albany has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any partners and sub-contractors that we work with. This due diligence relies on partner referrals, sponsor referrals and Albany's own questionnaires and research.

### **Value for Money & Transparency**

Other important areas of conduct where we focus particular attention include value for money and transparency. Albany's policy for delivering value for money involves the efficient, effective and economic use of funds. For all staff it means seeking out and implementing solutions which achieve the best mix of quality and effectiveness for the least outlay. This will flow down into each contract undertaken. Two elements to procurement are "staffing" and "supplies":

- i) Staffing - candidates will be selected on the basis of suitability to the task, as per the client's need Albany's gender policies require a minimum of 30% female, with up to 50% being recommended. Day rates will be obtained from each of the candidates and the best value selected. A contract will be drawn up stating the level of experience required for any service or agreed deliverables and this will be monitored and evaluated.
- ii) Supplies - product specification will firstly be agreed with the client and will then be tendered to at least three suppliers to provide quotations together with samples where applicable. A supplier is chosen on the best value in terms of price and quality and a purchase order is raised. Goods are then checked on receipt to ensure they meet the agreed standard and then signed-off samples will be provided to the FCO for your retention, if required. Payment to the supplier will be made within 30 days, following invoice. Buying power will be leveraged across contracts where the provision of similar items can be purchased if bought in bulk. The process was used on Albany's contract with the UN in Somalia - three quotes were obtained in Nairobi and the best value for money selected, the goods were then transported into Mogadishu. This was cheaper than production in Mogadishu where costs were far higher. However, in some cases, it may be more conflict sensitive to procure locally.

### **Environmental Policy**

Albany is committed to providing a quality service in a manner that ensures a safe and healthy workplace for our employees and minimises our potential impact on the environment. We will operate in compliance with all relevant environmental legislation and we will strive to use pollution prevention and environmental best practices in all that we do. In terms of carbon footprint, we travel only as necessary, well aware of the company's need to reduce its own environmental impact – and this extends to reducing the amount of printing done in the office, for example.

### **Corruption and Money Laundering**

Albany Directors and Staff shall abide by all applicable laws, regulations, codes and sanctions relating to anti-bribery and anti-corruption, including (but not limited to) the provisions of the Bribery Act 2010 and any related legislation. By way of example, they shall not offer, promise, authorise, pay or give, either directly or indirectly, to any other person any financial or other advantage in order to secure an improper advantage (financial or otherwise), to obtain or retain business, or direct business to any other person or entity. Albany Directors and Staff shall abide by all applicable laws, regulations, codes and sanctions relating to anti-money-laundering, including (but not limited to) the provisions of the Proceeds of Crime Act 2002 and any related legislation. Evidencing of our adherence to this policy, as recently as April of 2018 Albany highlighted to the British Embassy in Mogadishu concerns over the use of funds by a local contractor.

### **Privacy**

Albany is committed to protecting and respecting the individual's rights to privacy, and will only ever share it with organisations we work with where necessary, where permissions are in place, and if its privacy and security are guaranteed. In line with GDPR, we have been working across all areas of our organisation, and with our suppliers, to make further improvements, including: updating our processes and policies for privacy and data protection; training all Albany staff on the new regulations; developing wider use of Sharepoint (a secure, simple and direct way of sharing and accessing documents) for all exchanges of personal and confidential data; improving IT security and testing; reviewing the policies and procedures of our data processors, and our contracts with them; and improving marketing processes and systems.