

BBC Media Action upholds very high standards of ethical and professional behaviour as it has demonstrated throughout the delivery of all its work, including multiple DFID, FCO and CSSF projects as both a direct supplier and sub-contractor. It upholds the principles of the UN Global Compact, has robust systems in place to ensure compliance and is committed to acting with integrity and in a transparent manner whilst pursuing value for money.

Value for money and governance – we have economic and governance policies in place to ensure our projects are delivered in cost-effective way whilst maximising results. All policies are underpinned by the BBC [code of conduct](#) which ensures staff act with integrity, serve the public interest and do not engage in fraud and corruption. Specific organisational policies include safeguarding, IT, HR, procurement and protected disclosure/whistleblowing. Due diligence guidelines are in place to ensure that the partners we work with subscribe to the same standards. Checks and balances ensure key areas of the business have appropriate senior oversight and its organisational structure supports internal governance with a separation of powers between finance, procurement and programmes in all country offices and an independent audit and compliance function sitting outside management, reporting directly to the Executive Director. Each project has its own governance structure in place which includes donor representation to ensure effective and timely communication. Efforts to ensure **Value for Money** (VfM) cross-cut all our programming, and are designed to be maximised over the course of the project. We are committed to achieving the “4Es” of economy, efficiency, effectiveness and equity, balancing the most economical use of funding with ensuring we get the most yield from what we pay for, ensuring it is impactful and that it meets the needs of our target populations in as equitable manner as possible. Our £90million 14-country DFID Accountable Grant delivered from 2011-2017 was independently assessed to have “moderately or significantly over-performed against agreed VfM indicators, demonstrating excellent cost-effectiveness across the three thematic areas, at all levels”. VfM is considered at the beginning of projects and tracked and reported throughout the project cycle using a combination of quantitative and qualitative indicators. We are currently taking measures to boost our commitment to open book accounting.

To uphold **Ethical Behaviour**, measures to protect staff, partners, beneficiaries and contributors include [a safeguarding policy](#), Bullying and Harassment, Child Protection as well as a Protected Disclosure or “[whistle-blowing](#)” policy shared with staff during their induction and organisation-wide at least twice a year. These policies are underpinned by the BBC code of conduct and values which make clear to all staff expectations around behaviour, respect and trust. All staff must sign a [Declaration of Personal Interests](#) when they join BBC Media Action, and practicalities around this are explained during induction and training. Similarly, the BBC Anti-Bribery policy supported by mandatory anti-bribery training helps teams to think critically about the nature of their engagement with external stakeholders, and self-monitor whether interactions could be contravening anti-bribery or personal interest protocols. Such engagement extends to partners, including INGOs, media, civil society, government to service providers and vendors. Staff are made aware of relevant procedures around the reporting of fraud and counter terrorism finance to donors. We foster an organisational culture that makes it safe for the affected to come forward, and to report incidents and concerns with assurances of sensitive and proper handling. All staff complete mandatory training including sessions on whistleblowing, diversity, workplace respect and child protection with periodic refresher training. Reminders of expectations are shared through organisation-wide communication and within teams. BBC Media Action has policies in place to protect children and vulnerable people, taking an “informed consent” approach to use details and contributions from audiences in outputs and research; anonymity is given where appropriate.

All BBC Media Action recruitment internationally and locally is carried out in accordance with UK public sector equality requirements, key legislation on international principles on labour and ethical employment and the recruitment processes and policies of the wider BBC. To ensure fair

selection, these processes ensure that job descriptions are clear and specific, people are recruited in the appropriate pay band, and that the strongest candidates are selected for the roles. Job descriptions not only seek technical competencies, but also softer skills that ensure individuals possess appropriate skills for the day-to-day working environment. Recruitment is undertaken by a panel of two or more staff. All panel members are required to undertake a BBC 'Fair Selection' training prior to recruitment, and wherever feasible, panels are required to be gender and ethnically diverse. A structured scoring system identifies the strongest candidates and references offer additional guidance.

While our operating model does not require extensive and layered supply chains, the importance we place on responsibility for **transparency and delivery chain management** are important characteristics of our commitment to the BBC's 'Do No Harm' principle. We conduct due diligence on all partners at beginning of a collaboration and are enhancing our spot-checking during the programme cycle. The more substantive the partnership, the more extensive the due diligence. For instance, in our training work with media and CSOs, in-depth capacity strengthening assessments are designed to reveal not just systems and policies that are in place but the extent to which they have been adopted and inculcated in the organisation. Any agreements with supply partners for CSSF funding would pass down the requirements of the Code of Conduct and comprehensive records would be kept to document the flows of funding and flag any potential areas of risk and associated mitigation. We are registered with IATI and currently bolstering our efforts to publish data on our projects and funding. All UK payments adhere to the requirements of HMG prompt payment policy and payments at country-level usually take place at a cash (immediate) level.

The nature of BBC Media Action's work means that formal **environmental** safeguards are not usually appropriate. We are committed to reducing the impact of our work on the environment through improving recycling rates and ensuring that equipment is re-used where possible. We also directly address the impact of environmental risks in our programming where appropriate.

Terrorism and security - BBC Media Action is in compliance with HMG Cyber Essentials scheme however does not hold the certification. The BBC has designated information risk owners and as the BBC's headquarters are UK based, the BBC and BBC Media Action are governed, and comply with, the same laws and regulations as detailed in the DFID Security policy. The BBC's risk appetite is equivalent to HMG's and the BBC has a mature security incident management process. The BBC's standard encryption level is AES256 and it complies with ISO27001 standard.

The way that BBC Media Action's work is designed and delivered in line with the Global Principles for Digital Development and it is currently pursuing formal endorsement of the Principles. As per section 9.1 of the BBC's corporate security policy, the BBC Systems development methodology states that all systems development activity will follow an approved Systems Development Lifecycle (SDLC) methodology that ensures security is considered at all stages of the development lifecycle.

BBC Media Action subscribes to the BBC's [Code of Ethical Policy](#) which enshrines all principles of the Ethical Trading Initiative Base Code and reflects international standards set out in the ILO conventions. Furthermore, we are supportive of the Modern Slavery Act and running our organisation responsibly and maintaining a high standard of ethical and environmental trade practices. The BBC Modern Slavery Statement can be found [here](#). We are in the process of signing up to the UN Global Compact. At programming-level, we address issues and shift behaviour around the exploitative and unethical treatment of workers, for example through our [Preventing Bonded Labour project](#) in India and are committed to building the capacity of our local partners to ensure strong ethical standards.