

Blue Ventures Code of Conduct

This Code of Conduct should be read alongside Blue Ventures' safeguarding, disciplinary, grievance, whistleblowing, data protection, conflict of interest, travel, and health and safety and Anti-Fraud, Bribery and Corruption policies

Approved by the Board of Trustees on 22nd June 2026

Review Date: June 2029

This Code of Conduct has been developed in line with the principles of [*Common Approach to Protection from Sexual Exploitation, Sexual Abuse and Sexual Harassment \(CAPSEAH\)*](#)

Overarching Principles

1. Our ability to achieve our aims, often in complex environments, is linked to how we behave and, in particular, to the level of trust placed in us. The trust awarded to us relies heavily on all colleagues (and other representatives working for or on behalf of Blue Ventures in any capacity) upholding and promoting high standards of conduct and accepting their responsibility for safeguarding.
2. Blue Ventures' work is based on deeply held values and principles; these must be demonstrated by all colleagues and other representatives working for or on behalf of Blue Ventures in any capacity. If we fail to act consistently with our values and principles, we fail as an organisation.
3. We require all colleagues and representatives of BV to abide by the laws, customs, and traditions of the countries in which they work.
4. All personnel, equipment and finances must be used appropriately and effectively for the means for which they are designated.
5. All colleagues and other representatives working for or on behalf of the organisation in any capacity should report any potential incident, abuse, or concern they become aware of through the appropriate reporting systems and/or to a senior manager within Blue Ventures.
6. If you are a senior leader or manager, you have a particular responsibility to role-model the expected standards and [leadership behavioural competencies](#), create a working environment that supports everyone in upholding these standards, and appropriately address breaches of the Code of Conduct.
7. Colleagues and other representatives are responsible for their own actions and behaviour and must avoid any conduct that would lead a reasonable person to question their motivation and/or intentions, or bring BV into potential disrepute. They are expected to act at all times in good faith and in the best interests of BV.

Core standards of conduct

Act lawfully, honestly and with integrity

8. You must comply with applicable law and with Blue Ventures policies and procedures relevant to your role.
9. You must act honestly, accurately and in good faith in your work, including in records, expenses, approvals, recruitment, procurement, safeguarding, incident reporting and communications.
10. You must not falsify, conceal, alter, destroy or misrepresent information to avoid scrutiny, secure a benefit, disadvantage another person, or mislead Blue Ventures or any stakeholder.
11. You must not support, facilitate or profit from illegal activity, terrorism, sanctioned activity or dealings with a prohibited party.

Treat people with dignity, respect and fairness

12. You must treat all people with dignity, courtesy and professionalism, and the same professional standards should always be applied regardless of an individual's gender, race, ethnicity, religion or beliefs, disability, sexual orientation, marital status or age.
13. You must not engage in discrimination, harassment, sexual harassment, bullying, victimisation, humiliation, intimidation, abuse, exploitation or other conduct that infringes the rights, safety or dignity of another person.
14. Respect in this Code means behaviour that is civil, non-hostile and non-degrading. It includes listening, speaking appropriately, respecting boundaries, and avoiding conduct or language that a reasonable person would consider demeaning, threatening, intimidating, sexually inappropriate, discriminatory or humiliating.
15. You must not abuse a position of power, trust or influence.
16. You must support an inclusive working environment and comply with Blue Ventures' expectations for equality, diversity and inclusion.

Be transparent and accountable.

17. You must take responsibility for your actions and decisions.
18. You must promptly raise mistakes, risks, incidents, conflicts of interest, safeguarding concerns, misconduct concerns, and material information through the appropriate channels.
19. Transparency in this Code means being truthful, complete and timely in information you are expected to provide for work purposes. It includes not withholding relevant information, not giving a misleading partial account, and not avoiding disclosure where Blue Ventures reasonably needs the information to make a proper decision.

Protection, safeguarding, dignity, and rights.

20. You must complete all mandatory safeguarding training relevant to your role and follow safeguarding procedures, including BV's Safeguarding Policy.
21. You must not exploit, abuse, neglect, or harass any child, adult at risk, community member, colleague, partner or other person.
22. You must not engage in any sexual behaviour or activity with or towards anyone under 18, regardless of local law or custom.
23. You must not engage in any sexual behaviour or activity with or towards any adult at risk.
24. You must not engage in transactional sex or sexual activity or any form of prostituted sex.
25. You must not form or pursue any sexual or intimate relationship with community members where there is an actual, potential or perceived abuse of power, dependency, influence, access to benefits or imbalance of authority. Any exception must be declared and assessed under [BV's Safeguarding](#) and [Conflict of Interest procedures](#) before any work-related decision involving that person.
26. You must not trivialise, ignore, suppress or discourage the reporting of abuse, exploitation, harassment or safeguarding concerns.
27. You must not communicate privately with children or adults at risk through personal messaging, social media or other forms of contact except where this is explicitly authorised, necessary for the role, safe, recorded where possible, and compliant with BV's safeguarding procedure and Internet and Digital Communication Policy
28. You must not take, use or share images, audio or video of children or community members without the required permissions, lawful basis and compliance with Blue Ventures' procedures.
29. You must not place any child, adult or community member at risk or in an unsafe situation or do for them a personal task of an intimate nature that they can reasonably do themselves, except where there is an immediate safeguarding or medical need and the action is authorised or clearly necessary to prevent harm.
30. You should be aware of the paradigm patterns of grooming and not do anything (such as conferring special attention and favour upon a child, gift giving, inappropriate social contact) which might be construed as being part of a grooming process.
31. You should avoid any form of communication with a child or vulnerable adult which could be interpreted as sexually suggestive or provocative, either in verbal comments, letters, notes, electronic mail, phone calls, texts, social media, or through inappropriate physical contact.
32. If you suspect that you or any other community member has breached this section of the Code of Conduct, you should report it immediately to a senior member of staff.
33. The list above is indicative and not exhaustive, and represents the minimum of what we expect.

Alcohol, drugs and impairment

- 34. You must not work while impaired by alcohol, drugs or any other substance.
- 35. You must not consume alcohol or any other substance in a way that compromises safety, judgment, performance, professionalism, safeguarding, or compliance with this Code.
- 36. Impairment may be shown by observable signs such as slurred speech, the smell of alcohol, reduced functioning, poor coordination, drowsiness, aggression, inability to follow instructions, unsafe decision-making, or conduct that poses a real risk to yourself or others.
- 37. You must not possess, use, distribute, buy or sell illegal drugs or other illegal substances.
- 38. Where medication may affect your ability to work safely or perform a critical role, you must seek advice promptly and act on any reasonable instruction given to protect safety and performance.

Conflicts of interest, relationships and outside interests

- 39. You must avoid conflicts of interest where possible and declare any actual, potential or perceived conflict promptly to a senior individual at BV.
- 40. You must not take part in recruitment, procurement, contract management, grant-making, payment approval, disciplinary decisions or any other work decision where your personal interest could affect, or could reasonably appear to affect, your judgement.
- 41. You must not use your role to secure employment, contracts, payments, preferential treatment or another improper advantage for yourself, your family, your friends, a romantic partner, a household member or a close associate.
- 42. Any proposed business relationship involving a family member, friend, romantic partner, household member, or close associate must be declared in writing and approved through the relevant conflict-of-interest process before Blue Ventures enters into the arrangement.

Gifts, hospitality, bribery and improper benefits

- 43. You must not offer, promise, request, accept or give a bribe, facilitation payment, kickback or other improper benefit.
- 44. You must not ask for or invite any payment, service, favour or benefit in return for Blue Ventures assistance, influence, goods, services or decisions.
- 45. You may accept or give only modest, infrequent and proportionate (under £50 in value) gifts or hospitality where permitted by the [Anti-Fraud, Bribery and Corruption Policy](#), openly declared where required, and where they cannot reasonably be seen as influencing a decision.

Use of funds, assets and other resources

- 46. You must use Blue Ventures' funds, time, property, systems, information, and other resources responsibly, efficiently, and only for legitimate purposes.
- 47. You must protect Blue Ventures' resources from loss, theft, fraud, misuse, cyber risk and avoidable damage.
- 48. You must keep accurate records and comply with financial controls, procurement controls and authorisation limits.
- 49. You, your family or close associates must not obtain an undisclosed personal financial benefit from Blue Ventures operations, project expenditure, procurement, accommodation, logistics or other work-related arrangements.

Confidentiality, data protection and information security

- 50. You may have access to personal details to carry out your everyday responsibilities. In some circumstances, you may be given additional highly sensitive or private information.
- 51. Such information should be treated with discretion and kept confidential. You must protect sensitive information and use it only for legitimate work purposes.
- 52. You must handle personal data lawfully, fairly, securely and in accordance with data protection law and Blue Ventures policies, including its Data Protection policy.
- 53. You must report any actual or suspected data breach, cyber incident, loss of information or unauthorised disclosure immediately through the required reporting channels.
- 54. Nothing in this Code prevents a lawful protected disclosure to a regulator, a law enforcement agency, or another appropriate body.

Health, safety, security and environment

- 55. You must comply with health, safety and security requirements relevant to your role, travel and location.
- 56. You must not endanger yourself or others through reckless, negligent or deliberately unsafe behaviour.
- 57. You must report hazards, incidents and near misses promptly and cooperate with measures designed to reduce risk.
- 58. You must use natural resources responsibly and minimise avoidable environmental harm arising from Blue Ventures activities, travel and procurement.

Communications, technology and reputation

- 59. You must communicate professionally and lawfully and must not use Blue Ventures systems to access, create, store or distribute pornography, hate material, discriminatory material, abusive content or other inappropriate content.
- 60. You must not make statements on behalf of Blue Ventures without authority.
- 61. You must not engage in conduct, whether in person or online, that reasonably undermines trust in your ability to perform your role, the safety of others, or Blue Ventures' legitimate relationships or standing. In assessing this, Blue Ventures will consider the seriousness of the conduct, the connection to your role, any safeguarding or legal risk, the actual or likely impact, and whether the conduct is repeated.

Additional responsibilities for managers and senior leaders

- 62. Managers and senior leaders must model the standards in this Code and make sure their teams understand how to apply them.
- 63. They must take concerns seriously, act promptly, protect confidentiality as far as possible, avoid retaliation, and escalate matters through the correct procedures.
- 64. They must not dismiss, minimise or informally resolve serious concerns that require formal safeguarding, disciplinary, whistleblowing, fraud, grievance or other investigation processes, and they must ensure they follow BV's policies and procedures as required.
- 65. They must consider making reasonable adjustments and seek advice where a disability, health condition, cultural issue, language issue or other contextual factor may affect how conduct should be understood or managed, without lowering safeguarding or legal standards.

Reporting concerns and cooperating with investigations

- 66. All representatives have a duty to promptly report any safeguarding concern, misconduct or fraud, legal or policy breach, or other serious risk that they witness, experience, or reasonably suspect.
- 67. Reports should be made through the designated Blue Ventures reporting or whistleblowing channels, safeguarding channels, line management, HR, Legal, Finance or another route identified in policy, depending on the nature of the concern.
- 68. A person reporting in good faith will be supported and must not be subjected to retaliation, even if the concern is not ultimately substantiated.
- 69. Deliberately false, malicious or vexatious allegations may themselves be treated as misconduct.
- 70. You must cooperate honestly and promptly with any assessment, investigation, audit or inquiry and must not conceal evidence, influence witnesses, retaliate against another person, or otherwise interfere with a process.

Personal declaration

I confirm that I have read, understood and will comply with the Blue Ventures Code of Conduct for the full period during which I work for, am associated with, or represent Blue Ventures. I understand that breaches of the Code may result in disciplinary or other action, including dismissal or termination of engagement.

Name:

Job title:

Signature:

Date:

This Code of Conduct applies to all individuals working for or with Blue Ventures, whether or not they have formally signed it. By continuing to work for or with Blue Ventures after being made aware of this Code, or any updates to it, individuals will be deemed to have accepted the Code and agreed to comply with its requirements and any relevant contractual arrangements