

## British Council policies

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### COUNTER-TERRORISM AND MONEY LAUNDERING POLICY

The British Council is a UK organization for cultural relations and educational opportunities.

As a non-profit organization, the British Council must comply with applicable Brazilian law, including by making sure that its assets are protected and properly used to meet its objectives. We also have a duty to protect the public funds we receive. The funds must not be used to support criminal or terrorist intentions, or in any way that violates the applicable penalties.

This policy applies to all British Council operations worldwide, unless the local legal requirements are more stringent, or if the enforcement of the policy is unlawful under local regulations.

The British Council will assess the risks of becoming involved in terrorism and money laundering, and of violating applicable penalties. It will implement proportional measures to manage these risks, while continuing to work in difficult and challenging places.

The British Council undertakes to:

- Have systems, procedures, and controls in place, to make sure the risks of becoming involved with the funding or support to terrorist activity, money laundering, or violation of penalties are managed;
- For the highest-risk negotiations, check whether the funds that the British Council receives or works with are not on lists of banned terrorist groups or persons, lists of financial penalties, or other lists of regulatory compliance, and assessing the risks, if any;
- Train its team to be aware of the risks related to terrorist activity, money laundering or violation of penalties;
- Make sure that its staff understands their obligations to report any actual or suspected terrorist or money laundering activity; and

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- Comply with its obligations, informing the external authorities when necessary.

We require that all funds received by the British Council comply with this policy, to make sure that funds and assets are not used to fund or support terrorist or money laundering activity.

The British Council will review this global policy annually, to reflect new legal and regulatory developments and ensure the adoption of best practices.

## **EQUALITY, DIVERSITY AND INCLUSION POLICY**

The British Council creates opportunities for people from the UK and other countries and builds a relationship of trust between them around the world. The British Council seeks to work effectively with diversity and promote equal opportunities, and this is an essential part of the work.

The British Council is committed to ensuring that there is no unjustified discrimination in the recruitment, retention, training and development of employees based on age, disability, gender (including transgender), HIV/AIDS, marital status (including steady union), pregnancy and maternity, political opinion, race/ethnicity, religion and belief, sexual orientation, socioeconomic history, criminal background, trade union membership, work pattern, existence of dependents or any other data irrelevant to the function performed.

It also aims at respecting and promoting egalitarian legislation, following the laws and intentions they express in this area and seeking to avoid unjustified discrimination, recognizing that discrimination is a barrier to equality, diversity, inclusion and human rights.

The British Council undertakes to:

- understand, value and work with diversity, in order to allow fair and integral participation in our work and activities;
- ensure that there is no unjustified discrimination in our recruitment and selection processes, among others;
- promote equality, including checks on conditions of equality and impact assessments of policies and functions, as well as progressive action plans aiming at diversity;
- treat everyone with whom we work with justice, dignity and respect; and
- do our part to remove barriers and correct imperfections caused by inequality and unjustified discrimination.

The British Council requires all employees to ensure that their behaviour is consistent with this policy. It also asks that customers, users, partners and suppliers be aware of this policy and act accordingly.

The British Council will provide appropriate and adequate resources to implement this policy, and make sure that it is communicated and understood.

The British Council will review this policy annually, to reflect new legal and regulatory developments and ensure the adoption of best practices.

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## ADULTS AT RISK GLOBAL POLICY

Adults at Risk are people aged 18 years or over who:

- identify themselves as unable to take care of themselves or protect themselves from significant harm or exploitation;
- or are understood to be at risk, which may be due to frailty, homelessness, mental or physical health problems, learning or physical impairments, and/or impacted by disasters or conflicts.

Any adult anywhere can become at risk as a result of abuse of many different types or may be at risk as a result of a temporary or permanent situation. Abuse is a violation of an individual's human and civil rights by any other person or persons.

Commonly recognised types of abuse include:

- Physical abuse (including assault, rough handling, pushing, hitting, slapping, punching, kicking, biting)
- Domestic violence (controlling, threatening, degrading or violent behaviour between people who are or have been, intimate partners or family members)
- Sexual abuse (including rape, attempted rape or sexual assault, inappropriate touching, sexual teasing or innuendo or sexual harassment)
- Psychological abuse (including use of threats, humiliation, bullying, swearing or verbal abuse or enforced social isolation)
- Modern slavery (including people trafficking, forced labour and forced domestic servitude)
- Discrimination (for example regarding disability, age, gender, sexual orientation, ethnicity or race, religion or belief)
- Institutional abuse (maltreatment of a person in a care facility or other institution).

In the context of the British Council, Adults at Risk may include customers who pay for our services, participants in our programmes, end-users or beneficiaries of projects that we manage, and users of our online or social media products.

### Principles

The principles below govern this policy and its application:

- Empowerment – a person-centred approach that ensures that those affected feel involved and informed
- Mitigation – through planning, risk assessment and other measures minimising and managing situations where abuse could occur
- Protection – supporting victims so they can take action 1 In line with guidance from the UK Office of the Public Guardian (November 2015) we use the term 'adult at risk' in this policy in place of the term 'vulnerable adult'.
- Responding quickly to suspected cases of abuse
- Proportionality – making sure what we do is appropriate to the situation and for the individual

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- Accountability – making sure all organisations and individuals understand their role and accountabilities.

## **Standards**

### **Mitigating measures**

In every situation we will actively work together with relevant organisations and individuals to take all appropriate measures to safeguard adults at risk and to respond to allegations and disclosures.

Where responsibilities are shared with or transferred to partners or other organisations the responsibility will be clearly identified and documented.

Risk assessments will be carried out to identify adults who may be at risk; the potential risks to them; and to identify measures to mitigate these risks. Risks and mitigating measures will be monitored and reviewed at appropriate intervals.

Roles which involve regulated activity (work which involves close and unsupervised contact) with adults who are or may be at risk must comply with safer recruitment policy and guidance.

Awareness training will be provided to all staff; additional training and support will be provided for staff who are more likely to have direct or indirect contact with adults at risk or potentially at risk.

### **Disclosures, allegations and incidents**

All disclosures and allegations related to an adult at risk will be acted upon; all incidents will be reported and recorded in line with the procedures.

Any immediate safety and protection needs will be prioritised.

Our processes, actions and decisions will be informed by the need to take into account the wishes of the individuals at risk, and we will be mindful of the danger of increasing risk through our actions.

Where there is evidence a criminal offence has taken place, or a crime may be about to be committed, we will contact the appropriate authorities immediately.

We will strictly observe the provisions of data protection legislation and be mindful of other relevant UK and local legislation.

## **CHILD PROTECTION POLICY**

The British Council is the United Kingdom's international organisation for cultural relations and educational opportunities.

We believe that child protection requires everyone to take responsibility and that every child matters. We recognise that the care, protection and welfare of children is paramount and that all children have the right to be protected from all types of harm.

The British Council also recognizes that it has a fundamental duty of care towards all children with whom it interacts, including the duty to protect them from abuse. This goal is achieved through compliance with all applicable legislation on the protection of children, as well as compliance with the 1989 UN Convention on the Rights of the Child (UNCRC).

We aim to achieve this through compliance with UK child protection laws and the relevant laws in each of the countries where we operate and by adhering to Article 19 of the United Nations Convention on the Rights of the Child (UNCRC) 1989.

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A child is defined in the British Council as anyone who has not reached their 18th birthday (UNCRC 1989) irrespective of the age of majority in the country where the child is, or in their home country.

The British Council is committed to:

- valuing, respecting and listening to children
- ensuring all necessary checks are made when recruiting staff
- maintaining strong child protection systems and procedures for staff
- training its staff and providing a common understanding of child protection issues to inform planning and practice
- sharing information about child protection and good practice with children and parents/carers
- sharing information about any concerns with the relevant agencies and involving parents and children appropriately
- providing effective management for staff through clear processes, supervision and support.

We will provide adequate and appropriate resources to implement this policy and will ensure it is communicated and understood.

The British Council will review this global policy statement annually to reflect new legal and regulatory developments and ensure good practice.

## **ENVIRONMENTAL POLICY**

The British Council creates opportunities for exchange of knowledge between nations and the United Kingdom, creating a relationship of trust with the nations where it is based. Its operations and activities have an impact on the environment and, as such, it is committed to manage and reduce the impact of the organization on the environment.

The Environmental Management System (EMS) has been awarded the ISSO14001 certificate in the UK and the environmental action plan aims at reducing carbon footprint in the United Kingdom.

The British Council uses a tool called the Environmental Framework Tool (EFT), to manage its environmental impact in more than 100 countries where the British Council operates.

In Brazil, efforts are being made to improve environmental performance by using this tool, which requires the British Council to report progress in specific areas, including employee awareness and their understanding of the environmental impact of activities and behaviors.

The British Council undertakes to:

- evaluate, understand and control the environmental impacts arising from its activities;
- ensure compliance with all relevant national environmental legislation;
- define environmental objectives and targets for activities with significant impact, taking into account the aspirations of the partners;
- communicate progress in reducing environmental impact to stakeholders within and outside the British Council; and
- monitor and reduce the impact of corporate travel on the environment.

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The focus of the British Council will be to:

1. Reduce the use of power and water and the carbon emissions resulting from its activities;
2. Reduce the production of garbage, reinforcing practices to reduce use, reuse of materials and recycling;
3. Choose sustainable options during the procurement of goods and services;
4. Monitor and reduce the environmental impact of business travels and explore innovative mechanisms to further develop cultural relations in countries where it operates in an effective manner;
5. Use its creativity and global position to promote sustainability through commitment to the climate change agenda.

The responsibilities of the British Council are the following:

- Responsibility for the environmental policy falls on the National Officer
- The EFT National Coordinator is responsible for:
  - managing the implementation of the EFT in Brazil
  - leading the implementation team, called the Green Team Champions
  - completing the EFT evaluation process and submitting a report to the Regional Coordinator
- The implementation team, called the Green Team Champions, shall be responsible for:
  - working with the National Coordinator to promote environmental awareness
  - contributing to the development of the British Council's environmental policy and action plan for the country
  - leading specific tasks aligned with the EFT

The entire British Council team is responsible for adjusting to the new environmental policy and adjusting its actions to support the improvement of its environmental performance. Officers will be responsible for including in the induction of every new employee an introduction to the environmental policy.

## **ANTIFRAUD AND CORRUPTION POLICY**

The British Council creates international opportunities for people from the UK and other countries and builds relationships of trust between them around the world.

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As a nonprofit organization, the British Council must comply with the applicable Brazilian law, including by making sure that its assets are protected and properly used to meet its objectives. The British Council also receives British aid funds (through the Foreign and Commonwealth Office), and it needs to take steps to preserve these public funds.

The British Council has a policy of "zero tolerance" with regard to fraud, bribery and corruption. Always investigating and seeking to take disciplinary and/or legal measures against those who commit or assist someone to commit, fraud or any other improper activity in their operations.

The British Council undertakes to:

- Develop an anti-fraud culture throughout the organization;
- Seek to minimize opportunities for occurrence of fraud, bribery and corruption;
- Have effective systems, procedures and controls in place, which enable the prevention and detection of fraud, corruption and bribery;
- Make sure that its team is aware of the risks of fraud, bribery and corruption and that it understands its obligations to report any actual or suspected incidents of fraud, bribery or corruption;
- Analyze all reports of fraud, bribery and corruption seriously, and investigate them proportionately and appropriately; and
- Fulfill its obligations by reporting any incidents of fraud, corruption and bribery to the appropriate external authorities.

The British Council will provide appropriate and adequate resources to implement this policy and make sure that it is communicated and understood.

The British Council will review this global policy annually, to reflect new legal and regulatory developments and ensure the adoption of best practices.

## **DATA PROTECTION POLICY**

British Council complies with data protection law in the UK and laws in other countries that meet internationally accepted standards. You have the right to ask for a copy of the information we hold on you, and the right to ask us to correct any inaccuracies in that information. If you have concerns about how we have used your personal information, you also have the right to complain to a privacy regulator.

For detailed information, please refer to the privacy section of our website, [www.britishcouncil.org/privacy](http://www.britishcouncil.org/privacy) or contact your local British Council office.

We will use your personal data (email and phone number) to communicate the program details with you.

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