

COMMUNICATING THE CODE OF CONDUCT

In addition to training on the Code, some providers use mentorship to pass on the provider's culture of ethics to new staff. For example, **Compartamos Banco** in Mexico created its own Ethics and Values Department. One of the tasks of this Department is to select and maintain a network of 50 "Guardians of the Esprit de Corps," chosen because they have long tenures with the organization and exemplary records of leadership, ethical behavior, and customer service. As part of employee induction, each new recruit meets with one of the Guardians, who functions as a mentor and answers questions and addresses any doubts the new staff person may have. Finally, clients need to know their rights in order to recognize and react when they are not treated with fairness and respect. In order for them to know their rights, the institution must inform them of the main aspects of the Code of Conduct, including what is not expected behavior and unacceptable behavior by staff. Your clients should also know their rights when it comes to collateral seizure, loan rescheduling procedures, data privacy, making a complaint, and receiving account information. Communication to the clients about their rights may be verbal (at different points during the product process) or written (posters displayed in branches, inside client passbooks, on the contract, in a key facts summary, customer charter, brochures, or other documentation).

Here is an outline for a code of conduct:

- Introduction – purpose of the Code
- Institutional mission and values
- Rules of conduct
 - Employee rights
 - Behavior toward other employees
 - Behavior toward clients
 - Behavior toward the community and the environment
- Sanctions for Code violations
- How to report Code violations and whistleblowing protections
- Updating and providing feedback on the Code

In addition to stating the positive values and behaviors expected of staff (e.g. "respond with patience and professionalism to angry customers"), also outline the behaviors that the institution will not tolerate. These should include, at least the following:

- Using abusive language
- Using physical force
- Limiting physical freedom
- Shouting at the client
- Entering the client's home uninvited
- Publicly humiliating the client
- Violating the client's right to privacy
- Mistreating a client based on any protected categories (e.g. race, gender, religion, ethnicity)
- Using intimidation or threats

- Sexual or moral harassment
- Fraud
- Soliciting or accepting bribes and kickbacks