

International Internships – Code of Conduct

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I. Introduction

International Internships seeks to provide a safe and enjoyable program for all participants. To support this, the **International Internships Code of Conduct** articulates expectations of behaviour for everyone – to each other, and all those we encounter.

The Code of Conduct applies equally to all personnel from the following groups, and applies to all International Internship programs – regardless of whether they are delivered in-country, or virtually:

- International Internships – employees, contractors, external providers (transport, accommodation, tours etc)
- Host organisations – managers, supervisors and staff
- Partner universities – in Australia and Indonesia
- Program participants – students, interns and buddies
- Program participants – speakers, presenters and mentors

Program participants must also agree to the [International Internships Terms and Conditions](#). A link to this document is provided to students/interns at the time of their initial registration, and they must agree to abide by the Terms and Conditions before their application can progress.

II. Expected behaviours

At all times, everyone involved in an International Internships program, regardless of their status, must ensure that their behaviour:

1. Does not bring any of the following organisations into disrepute:
 - a) International Internships
 - b) Home university
 - c) Host organisation
 - d) Indonesian government
 - e) Australian government

2. Complies with:
 - a) Australian laws
 - b) Indonesian laws – including for offences which may not be illegal in Australia or your home country
 - c) Visa conditions
 - d) Australian Government Department of Foreign Affairs and Trade (DFAT) policies, including:
 - [Preventing Sexual Exploitation, Abuse and Harassment Policy](#)
 - [Child Protection Policy](#)
 - e) New Colombo Plan policies (if in receipt of a mobility grant), including:
 - [New Colombo Plan – Student Code of Conduct](#)
 - [New Colombo Plan Mobility Program – Media and Publications Guidelines](#)
 - f) [International Internships Terms and Conditions](#) (for students and buddies only)
 - g) Policies of the host organisations
 - h) All reasonable directions issued by International Internships

Failure to comply with any of the above will be considered a breach of the Code of Conduct

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III. Core principles

The following core principles underpin this Code of Conduct:

- **Respect** – respecting individuals (whether authority figures or peers); respecting other cultures; respecting organisations
- **Integrity** – adhering to laws of both Australia and Indonesia; respecting and following policies of International Internships, partner universities and host organisations; avoiding conflicts of interest (real, apparent, or potential); behaving honestly
- **Professionalism** – always behaving professionally and appropriately; ensuring that positions of influence or power are not abused, demonstrating sound judgement
- **Legal adherence** – following the laws of both Australia and Indonesia, and policies of International Internships, partner universities and host organisations
- **Equity and social justice** – empowering others; safeguarding vulnerable people; calling out racism and discrimination
- **Diversity and inclusion** – being inclusive to those from different backgrounds or with different life experiences; avoiding any form of discrimination, bullying or harassment
- **Collaboration** – building trust with others and creating a safe environment for everyone to share their views and ideas; creating mutually beneficial partnerships; recognising the value of others' knowledge and experience
- **Sustainability** – considering the environmental impact of our actions at individual and organisational levels
- **Accountability** – taking personal responsibility for our actions and behaviour; making best efforts in every endeavour
- **Do no harm** – ensuring actions do not expose people to additional risk; recognising how actions may impact or influence others

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IV. Safety

The safety of everyone involved in an International Internships program is of paramount importance. This includes physical safety, as well as psychological safety. Under no circumstances will anyone be forced to participate in an activity or work in an environment they, or International Internships, consider to be unsafe.

It is recognised that International Internship programs are undertaken in environments quite different to Australia, with different workplace health and safety regulations. International Internships has a comprehensive Risk Management Framework, the principles of which are embedded throughout program activities and documentation. All risks related to program activities are actively assessed. Mitigation strategies are then implemented to eliminate, reduce or manage risks.

At an individual level, everyone is responsible for determining their competence, and confidence, in each situation and to make an active choice to participate voluntarily. It is an individual responsibility to ensure that they are comfortable participating in any program activity, and to raise any concerns directly with International Internships as soon as possible.

Program participants travelling from Australia are required to follow all advice and guidance provided by DFAT on the [Smartraveller](#) website.

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V. Respectful behaviour

All personnel covered by the Code of Conduct have a moral and legal obligation to demonstrate and foster a positive and respectful environment which treats everyone with dignity and respect, free from:

- Abuse
- Bullying
- Harassment
- Sexual exploitation
- Sexual harassment
- Victimization, or
- Discrimination in any form, including on the basis of:
 - Age
 - Disability
 - Race
 - Sex
 - Gender identity
 - Sexual orientation, or
 - Religion.

Everyone involved in an International Internships program, regardless of their status, must comply with DFAT's [Preventing Sexual Exploitation, Abuse and Harassment Policy](#).

People in positions of leadership, or with management or supervisory responsibilities, must also model respectful behaviour and set clear expectations of those they lead, manage or supervise.

We must, at all times, treat others with respect and courtesy. Failure to do so will constitute a breach of this Code of Conduct. For leaders, supervisors and managers, this may also represent an abuse of power and position, and may also be subject to reporting to an intern's home university and/or police.

Even one-off incidents of disrespectful behaviour are unacceptable. They may have a profound impact on victims, and create an unwelcoming and threatening environment. And unless addressed, they can develop into a repeated pattern of behaviour.

Disrespectful behaviour can be harmful to the person experiencing it, and to those who may witness it. The effects will vary in nature and severity depending on the personal history of the individuals involved, the nature of the behaviour and the specific situation. Impacts may be physical, psychological and/or social.

In addition to the impact on individuals, disrespectful behaviour can have a negative impact on the program environment, work performance, and the reputation of organisations.

A detailed guide on respectful behaviour, consistent with DFAT's policy on Preventing Sexual Exploitation, Abuse and Harassment, is provided in [Appendix A](#), and is intended to help everyone involved in an International Internships program understand what is meant by respectful behaviour. It also outlines what steps to take if an individual experiences, or witnesses, unacceptable behaviour.

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VI. Child protection

International Internships has a zero tolerance approach to child exploitation or abuse, and recognises that, under DFAT's [Child Protection Policy](#), it is the shared responsibility of all adults to prevent child exploitation. All individuals covered by this Code of Conduct must agree to adhere to the professional behaviours as outlined in [Appendix B](#).

A potential host organisation whose primary function relates to children or vulnerable adults will be required to demonstrate the ways in which they mitigate any potential risk of child exploitation or abuse before a formal agreement is signed with International Internships, and before any interns can be placed with the organisation.

A criminal history check will be required for an intern who is placed with a host organisation whose primary function relates to children or vulnerable adults. To comply with DFAT recommendations, criminal history checks will be required for all countries in which the individual has lived for 12 months or longer over the past 5 years, and for all countries of citizenship. For Australian residents, people who work in Australia, or people who have worked in Australia in the past 5 years, a [National Police Check](#) from the Australian Federal Police will be required.

Any suspected cases of exploitation or abuse of children should be reported to International Internships via the mechanism outlined below.

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VII. Breaches of the Code of Conduct

Any deliberate action which compromises the safety and wellbeing of any individual (a participant, an employee of International Internships, a partner university, a host organisation, or any other person) will be considered a breach of the Code of Conduct.

Breaches of the Code of Conduct, or any of the policies outlined in [III: Expected behaviours](#), are taken very seriously by International Internships.

Reporting a breach of the Code of Conduct

Alleged breaches of the Code of Conduct or associated policies can be reported to International Internships at any time, by:

- Speaking to the International Internships staff member in charge of the relevant program activity, or
- Emailing Australia@internationalinternships.com.au with the subject line: **CODE OF CONDUCT** outlining the details of the alleged breach, including:
 - Type of allegation
 - Date(s) of alleged breach
 - Location of the alleged breach
 - Details of the alleged breach
 - Whether the alleged breach has been reported to the police or other authorities (only if applicable)
 - Any other relevant information

Any reported breach of the Code of Conduct will be fully investigated through a procedurally fair process, and will follow the principles of natural justice.

Depending on the nature of the breach, the consequences may be significant. International Internships may:

- Advise a program participant's home university in Australia
- Terminate the involvement of a program participant, host organisation, or any other person involved with delivery of an International Internships program
- Report any unlawful activities or behaviour to the relevant authorities (as required by law)

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Program participants – students/interns

If a program participant's involvement in an International Internships program is terminated due to a breach of the Code of Conduct, the program participant:

- Will be required to return to Australia as soon as practicable
- Will be responsible for any costs associated with returning early, and
- Will not be entitled to any refund.

VIII. Responsibilities

All personnel (as listed in [Section I](#) above) must ensure they understand their obligations, and comply with the Code of Conduct and any associated policies, procedures, laws, and regulations at all times.

Information

If you require clarification or have any questions about anything related to this Code of Conduct, please contact info@internationalinternships.com.au.

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Appendix A: Respectful behaviour guidelines

International Internships has a zero-tolerance policy for any unacceptable or inappropriate behaviour.

As outlined in this Code of Conduct, we must always treat others with respect and courtesy.

Listed below are **some** examples of unacceptable behaviour, which is consistent with DFAT's policy on [Preventing Sexual Exploitation, Abuse and Harassment](#).

It is important to remember that respectful behaviour is required in all personal interactions, whether in person, or virtual. This includes unwelcome, offensive, or hostile facial expressions, body gestures, and behaviour.

In all cases of disrespectful or unacceptable behaviour –even if you are not personally involved – if you see something, say something.

International Internships has a duty of care to take action if they witness, or are advised of, behaviour which constitutes bullying, discrimination, sexual harassment, or victimisation.

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Intercultural Sensitivity

There are significant cultural differences between Indonesia and Australia, and norms and standards of conduct in one country may not be acceptable conduct in the other. In addition, International Internships programs are open to students from a range of backgrounds around the world. Consequently, individuals may encounter cultural differences that are difficult to anticipate.

All individuals involved in International Internships program activities are encouraged to approach intercultural situations sensitively and with an open mind, and conduct themselves with a high degree of discretion, sensitivity, and open-mindedness.

Individuals in positions of leadership, management or supervision are expected to provide guidance, and not judgement, on issues of intercultural sensitivity. If there is a clash between an individual's personal cultural identity and beliefs, assistance and guidance should be sought from the International Internships Program Manager or Australian-based staff to ensure that the safety and wellbeing of all individuals is always the highest priority.

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Bullying

Bullying involves treatment of a person, or a group that:

- Unfair or unreasonable
- Repeated or ongoing
- Makes people feel embarrassed, victimised, humiliated, threatened, or undermined

A single incident of unreasonable behaviour is not necessarily considered to be bullying. However, it may have the potential to escalate and will not be ignored.

Bullying may be obvious or aggressive, or be more covert behaviour. If bullying behaviour involves physical abuse or threats of violence, the perpetrator may be subject to criminal law. Bullying

- Physical or verbal abuse
- Aggressive or intimidating conduct
- Exclusion from program-related events
- Unreasonably criticising people
- Belittling or humiliating comments
- Pressure to behave in an inappropriate manner
- Spreading malicious rumours or gossip
- Displaying offensive material
- Teasing, practical jokes or hazing/initiation ceremonies
- Withholding information to undermine work performance or program participation

Bullying behaviour can be perpetrated by anyone, and can continue unchecked if people don't want to address it, or consider it to be part of the workplace environment. Bullying can be very harmful to people's health and well-being as well as workplace performance.

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Discrimination

It is unlawful and unethical to discriminate against people because of their personal characteristics or because they belong to a certain group. This includes unfair treatment, in a way that can cause loss of humiliation, because of:

- Age
- Caring responsibilities
- Chosen gender
- Disability
- Marital or domestic partnership status
- Pregnancy
- Race/ethnicity
- Religious appearance or dress
- Sex
- Sexuality
- Spouse or partner's identity

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Sexual harassment

Sexual harassment means any unwelcome conduct of a sexual nature, where it is reasonable to expect that the other person may be offended, afraid or humiliated.

Both men and women can be both the perpetrator, and the victim, of sexual harassment. Like other forms of disrespectful behaviour, sexual harassment can be:

- Obvious or indirect
- Physical or verbal
- Repeated or one-off

Sexual harassment is determined from the perspective of the person feeling harassed. It does not matter how the behaviour was intended. What matters is the effect on the other person.

Sexual harassment includes:

- Leering or staring
- Unnecessary familiarity, such as unwelcome affection, touching or kissing
- Commenting on a person's appearance
- Suggestive comments, jokes, or name-calling
- Insults or taunts of a sexual nature
- Intrusive questions or statements about someone's private life



- Distributing pictures, objects, emails, text messages or literature of a sexual nature
- Inappropriate advances on social networking sites
- Direct or implied propositions, or requests for dates
- Asking about a person's sexual history or sexual activities
- Request for sexual favours, either directly or by implication
- Behaviour that may also be an offence under criminal law such as physical assault, indecent exposure, sexual assault, stalking or obscene communications

Mutual attraction or friendship with active consent is not sexual harassment.

However, it is important to remember that, in circumstances where there is an imbalance of power or authority means, consent may not be given freely or without reservation in all cases, particularly when interactions involve young adults or people from marginalised groups.

For this reason, **any** individuals with leadership, management or supervisory roles – including but not limited to International Internships staff members, supervisors at host organisations, speakers or presenters, mentors, or more senior members of any peer group – should be particularly mindful and ensure that their behaviour is beyond reproach.

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Sexual abuse

Sexual abuse is the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It covers sexual offences including but not limited to:

- Attempted or actual rape, which includes attempts to force someone to perform oral sex
- Sexual assault, which includes non-consensual kissing or touching

All sexual activity with someone under the age of consent is considered to be sexual abuse.

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Sexual exploitation

Sexual exploitation is any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes. It includes profiting monetarily, socially, or politically from sexual exploitation of another person.

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Victimisation

Victimisation is treating people unfairly because they have made complaints about bullying, discrimination and/or sexual harassment, or because they have supported someone else to do so. Victimisation is unacceptable because it punishes people for speaking out against inappropriate behaviour, and may prevent them from doing so in the future.

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What is NOT disrespectful behaviour

It is important to remember that the following are not necessarily examples of disrespectful behaviour:

- Disagreements

- Differences of opinion
- Diversity in personality and style

If handled respectfully and skilfully, these can all enhance individual and team effectiveness and performance.

However, the ways in which we deal with conflict can determine whether the outcome is constructive/positive or destructive/negative.

We all have a responsibility to handle conflict in a way which supports a positive and inclusive environment, and maintains positive relationships. Conflict which is not managed may escalate to a point where it meets the definition of bullying.

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Responding to disrespectful behaviour

International Internships prioritises the safety and wellbeing of all individuals involved in program activities, and takes all reports of disrespectful or unacceptable behaviour seriously.

Experiencing disrespectful or unsafe behaviour can be stressful and unsettling in any circumstances, but the experience can be intensified if this occurs away from usual support structures and/or in a different environment.

Below are some guidelines for dealing with instances of disrespectful behaviour. Anyone experiencing, or witnessing, disrespectful behaviour is encouraged to contact the International Internships team at any time.

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Clarifying the situation

It can be difficult in times of stress to be objective. To determine the most appropriate action, it is important to first identify whether the behaviour you are experiencing or witnessing is bullying, discrimination, sexual harassment, victimisation - or not – by:

- Reviewing the information in this Code of Conduct
- Seeking the perspective of another person who is not involved, to help you determine whether the behaviour meets the definition of bullying, discrimination, sexual harassment or victimisation
- Seeking advice (if the behaviour does not appear to be bullying, discrimination, sexual harassment or victimisation) on strategies that may help resolve what has happened and how you are feeling – for example, if the behaviour seems unreasonable but it has not escalated to bullying, raise it either with the person directly or with a member of the International Internships team
- Continuing to monitor the situation over time.

Keep a diary or notes of incidents – when and where they happened, who was responsible, if there was more than one person involved, how you felt, potential witnesses etc. Notes can be useful to demonstrate a pattern of events and may also help you in resolving the issue. Notes are also important if you need to escalate the issue to a more formal process.

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Speaking out

Speak out against bullying, discrimination, sexual harassment and victimisation if it is experienced or witnessed, and support others to speak out. Some people may be afraid to report bullying, yet bullies can rely on the very silence of their victims to keep on harassing them. Sometimes a bully might not be aware of the effect of what they are doing or even that they are being a bully. They may not realise the effect their behaviour is having on you or others, and your feedback may give them the opportunity to change their actions.

If you feel safe and comfortable doing so:

- Calmly tell the other person as soon as possible you object to their behaviour and ask that they stop
- Suggest an alternate way of behaving in the circumstance, which is acceptable to you

If you are unable to speak directly to the person concerned, or if you have raised the behaviour with the bully without success, we encourage you to talk to an International Internships program team member as soon as possible, and seek advice about how to proceed.

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Informal or formal processes

There are a range of options available to individuals who experience bullying, discrimination, sexual harassment or victimisation. These options can generally be divided into informal actions and formal procedures.

Wherever possible, it is desirable to resolve matters informally, at the local team level, and as closely to the time the action occurred. Early intervention should focus on collaboration between the relevant people, and can be instigated by the individual affected, or a member of the International Internships team, monitored by the International Internships Program Manager, and may include other support people.

Every situation will be managed within the context of its unique circumstances and the individuals involved.

Informal processes to resolve issues should be used if:

- It relates to a single incident
- The behaviour appears to be unintentional
- The person who raised the issue agrees to an informal process.

Addressing disrespectful behaviour informally will usually involve:

- Getting clarity about whether or not the behaviour is bullying, discrimination, sexual harassment, victimisation, or something else
- Raising concerns about the person's behaviour directly with them or with an International Internships team member
- Discussing the behaviour with the person, either personally or via an International Internships team member
- Making an agreement about future behaviour that is acceptable and unacceptable
- Monitoring the situation
- Escalating the matter if unresolved

Formal processes should be used when:

- Informal processes have failed, or it is unlikely that an informal process will resolve the issue
- The behaviour is serious or longstanding
- There is increased risk or complexity
- There is significant agreement about what has occurred and what should happen

Addressing disrespectful behaviour formally usually involves:

- Making a complaint in writing
- Conducting an investigation
- Determining whether misconduct has occurred
- Determining the consequences

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Special note for individuals with authority or responsibilities of leadership, management, or supervision

Depending on their individual circumstances, one or more of the following may apply to program participants (students, interns or buddies) involved with International Internship programs:

- They may be young adults
- They may be in an unfamiliar environment
- They may be away from their regular routines and support structures
- They may not have travelled internationally
- Their International Internships experience may be the longest engagement away from home

As a result, any individual in a position of authority, or with leadership, management, or supervisory responsibilities needs to be especially vigilant regarding disrespectful behaviour and harassment. Program participants may not feel capable or comfortable to reach out for support or report instances of disrespectful behaviour.

International Internships staff, and any individuals in a leadership, management, or supervisory position must be proactive in ensuring the wellbeing of all program participants. They must also be particularly mindful of their conduct, which may be deemed inappropriate due to their position, and the special vulnerabilities of students/interns/buddies.

For example, the following are deemed inappropriate between an individual in a position of leadership, management or supervision and a student/intern/buddy:

- Excessive familiarity and/or personal communications unrelated to program activities
- Any kind of physical relationship
- Any kind of financial interaction/relationship (in the event of a student needing emergency funds due to a locked account/lost bank card, the appropriate response will be to arrange a loan from International Internships as an organisation, as part of an official, documented response)

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Appendix B: Child protection – professional behaviours¹

In addition to anything already considered a criminal offence (either in Indonesia or Australia), individuals covered by this Code of Conduct are expected to adhere to the following behaviours if they encounter children as part of program activities, taken directly from DFAT’s Child Protection Policy if they encounter children as part of their program activities:

- Treat all children with respect
- Not use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate
- Wherever possible, ensure that another adult is present when working near children
- Not invite unaccompanied children into private residences, unless they are at immediate risk of injury or in physical danger
- Not sleep close to unsupervised children unless absolutely necessary, in which case the supervisor’s permission must be obtained, and ensuring that another adult is present if possible (noting that this does not apply to an individual’s own children)
- Never use any computers, mobile phones, video cameras, cameras or social media to exploit or harass children, or access child exploitation material through any medium
- Be aware of behaviour and avoid actions or behaviours that could be perceived by others as child exploitation and abuse

Photography or film

If photographing or filming a child, or using images of children for work-related purposes:

- Take care to ensure local traditions or restrictions for reproducing personal images are adhered to before photographing or filming a child
- Obtain informed consent from the child and parent or guardian of the child before photographing or filming a child. An explanation of how the photograph or film will be used must be provided
- Ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive
- Ensure images are honest representations of the context and the facts
- Ensure file labels, meta data or text descriptions do not reveal identifying information about a child when sending images electronically or publishing images in any form

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Declaration

I agree to abide by the International Internships Code of Conduct

Name:

Organisation/Institution:

Date: **Signature:**

¹ All content in the list of behaviours is taken from Department of Foreign Affairs and Trade (Australia) (2018) ‘Child Protection Policy’ (Attachment B, p. 16-17) <https://www.dfat.gov.au/sites/default/files/child-protection-policy.pdf>