



**ecsecc**  
eastern cape socio economic  
consultative council



# CODE OF ETHICS IMPLEMENTATION PLAN

Policy Category: Governance  
Related Policy: Ethics & Conflict of Interest Policy



## Document Information

### Revision History

Version	Primary Author	Summary of Changes	Date
1	Chief Financial Officer	Ethics Policy Implementation Plan – New Plan Created for 2019/20 year	March 2019

### Review

This document shall be reviewed every three (3) years unless warranted sooner

#### Office responsible for review

Chief Financial Officer's Office

### Approval

Name	Position	Signature	Date
Mr. Luvuyo Mosana	Chief Executive Officer		April 2019

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## 1. SCOPE

The purpose of this plan is to provide direction to facilitate the implementation of the Ethics Policy. This Policy was approved by the Board of Directors in January 2019. It is therefore applicable to all ECSECC employees, Board of Directors and Suppliers.

A good Code of Ethics is characterized by the presence of implementation mechanisms associated with it. These include activities that the organisation needs to set up (or revise) to support the diffusion and knowledge of the Code, to foster the sharing of values and rules of behavior, and to monitor the effective implementation of the code and manage its periodic review.

## 2. THE PLAN

### 2.1 Communication and Awareness

The following communication and awareness mechanisms will be employed by ECSECC:

- a. Both the policy and plan will be distributed to staff members through the organization's intranet;
- b. ECSECC Core Values, Ethical Statement and Reporting arrangements will be visibly displayed within the building;
- c. Organisation email signature will refer to ECSECC's core values, Ethical Culture and Reporting;
- d. A summary of the policy and reporting mechanisms will be placed on the ECSECC website for stakeholders and suppliers to have access to;
- e. In the annual acknowledgement of the ECSECC Code of Conduct by employees, Ethical Conduct will also be included;
- f. Request for Quotation and Service Level Agreements with suppliers will include a paragraph on Ethical Conduct and Reporting;
- g. Ethical conduct will be included in the performance evaluation of all ECSECC employees, service providers and the Board; and
- h. Code of Ethics will be incorporated into the induction of all new employees and as part of fiduciary duties of new Board members.

## 2.2 Ethics Training

The most effective ethical training programs are those that give examples of ethical problems that the employees may have to deal with as part of their specific jobs. In other words, the information presented in an ethical training is more likely to be understood and utilized if it is specific to the job being performed. Hence a job-specific ethics training program will be developed to take place once every 3 years.

## 2.3 Enforcing the Code

ECSECC requires all employees to report any ethical violations that they witness. In addition, all managers contacted about ethical violations must promptly review all reports of unlawful or unethical conduct. Lastly, ECSECC has zero tolerance for threats or acts of retaliation against employees who report ethical violations. ECSECC shall employ all mechanisms available within its means to protect Whistle Blowers (*for further detail, refer to Fraud and Prevention Strategy and Plan*).

The following are the mechanisms for reporting:

- a. Directly with the individual's manager or any other manager;
- b. Directly with the Chief Financial Officer, who is also the Compliance Officer; or
- c. Anonymously via the ECSECC website, this report will go directly to Internal Audit for investigation.





Suppliers and external stakeholders can report to any member of management, the Compliance Officer or make use of the website to report anonymously directly to Internal Audit.

Ethical enforcement mechanisms are effective only when they are backed by sanctions. Non-compliance will be dealt with as follows:

- a. Employees: in terms of ECSECC's HR Policy;
- b. Board of Directors: in terms of the Board Charter;
- c. Suppliers: in terms of Service Level Agreement entered with supplier;
- d. External Stakeholders: in terms of any guiding documentation between ECSECC and the stakeholder within the ambits of the South African Law.

## 2.4 Monitoring and Reporting

ECSECC, via the Compliance Officer, will report on Ethical Conduct in the following manner:

- a. Monthly in the Management Meetings;
- b. Quarterly in the ECSECC Staff Meetings;
- c. Quarterly in the Audit, Risk and ICT Board Sub-Committee (ARICT);
- d. Quarterly to the Board of Directors, via ARICT;
- e. Inclusion in the Annual Report of:
  -  An overview of the arrangements for governing and managing ethics;
  -  Key areas of focus during the reporting period;
  -  Measures taken to monitor organizational ethics and how the outcomes were addressed;
  -  There are sanctions and remedies in place in instances of breach of ethical standards.

## 3. EFFECTIVE DATE

This implementation plan shall be effective from April 2019 and shall apply prospectively.

## 4. REVIEW DATE

This implementation plan shall be reviewed every three (3) years unless warranted sooner.





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