



Governance: An Overview of Requirements for GFAS Accredited Sanctuaries and Rescue Centers

In addition to meeting standards in areas of animal care and safety, accredited sanctuaries are asked to submit a number of documents in the area of governance. Where applicants do not have these documents, we are happy to assist by providing templates and samples, discussing what is needed, and reviewing drafts to offer feedback. None of these policies need to be long and complicated, but they each need to address a few key issues. Here is a short overview of what we request, consistent with our most recent update of the GFAS Operations Standards, and what they are.

The Code of Ethics

GFAS standards state that the organization should have:

- A written code of ethics for the sanctuary that addresses the core values of: integrity, openness, accountability, service and charity, and reinforces standards of professional behavior. All personnel associated with the sanctuary have been provided with access to the code of ethics and have agreed to adhere to it.

Codes of ethics are a way to state and share an organization's values, and they may differ based on the organization's work. For example, a sanctuary's values may include its understanding of what "sanctuary" means, or a sanctuary caring for primates rescued from research may have a stated value that non-human primates are sentient beings who should not be used as research subjects. The organization's board or other governing body should adopt the code of ethics, and it can be displayed publicly on the sanctuary's website as well as displayed internally for all personnel to see.

This link from the National Council of Nonprofits gives more information on codes of ethics with links to samples:

<https://www.councilofnonprofits.org/tools-resources/code-of-ethics-nonprofits-why-your-nonprofit-may-want-adopt-statement-of-values>

Conflict of Interest Policy

GFAS standards state that an organization should have:

- A written Conflict of Interest policy prohibiting any Board member, director, or key employee from approving or voting on a transaction in which he or she has a monetary or other interest. Members of the Board of Directors and the director, as well as key personnel as appropriate, are asked to sign written acknowledgements of receipt of the policy and have disclosed potential conflicts of interest.

Conflict of interest policies can be written in different ways, and at times are incorporated into an organization's bylaws. The intent of this policy is that an organization's governing body has an awareness of activities that could present a conflict (for example, if a board member could personally

benefit from a contract into which the organization enters), and has procedures in place to address real and potential conflicts, as well as the appearance of a conflict. Some local laws, e.g. state-specific laws in the U.S., may have certain requirements regarding conflict of interest policies, and we encourage applicants to check this.

There are a lot of resources on the internet that explain the purpose of a conflict of interest policy. Here's a great one from Independent Sector:

<https://independentsector.org/programs/principles-for-good-governance-and-ethical-practice/principle-3/>

Anti-Discrimination Policy

GFAS standards state that an organization should have:

- A written anti-discrimination and anti-harassment policy, specifically referring to any protected class under law.

Today more than ever, it is important for an organization to have policies addressing diversity and inclusion and an affirmative statement against discrimination and harassment that extends throughout the organization, including all personnel and volunteers. Laws on protected classes may differ by location, so we encourage applicants to check and make sure that their policies comply with any applicable national and local laws.

Grievance Policy

GFAS standards state that an organization should have:

- A written grievance process that is clearly communicated to the staff and volunteers to communicate the procedure for reporting a concern regarding workplace-related issues, including ethics complaints; includes an alternate pathway if the normal person to whom one should take concerns is non-responsive or the focus of the concern; and allows for fair, prompt and meaningful resolution.

It is important for an organization to have a process in place for personnel to make their concerns known, to make sure that personnel know of this process, and to follow the process once a grievance is received. Grievances may include concerns about being harassed or discriminated against, being unfairly treated during a personnel evaluation process, or other workplace-related issues.

As with the other governance policies, this can be a very short and straightforward document. What is important is that it is clearly stated and that people are aware of it. It can be included in employee manuals, posted on bulletin boards in staff rooms, and shared in a number of other ways.

Whistleblower Policy

GFAS standards state that an organization should have:

- A written "whistleblower" policy, consistent with applicable law, that protects personnel from retaliation when coming forward in good faith with information about illegal or fraudulent activities or violation of adopted policies and protocols of the organization. Such

policies and protocols include but are not limited to matters of financial mismanagement, accounting and concerns about animal care and the safety of both animals and humans.

A whistleblower policy should also identify to whom (such as staff, board members, or designated outside parties) personnel should report any such information.

This kind of policy is meant to protect those in an organization – staff, board, volunteers – who report in good faith concerns about illegal practices (such as theft) or violations of organizational policy, so that they can come forward without fear. A whistleblower policy should include statements that the whistleblower's identity will be kept confidential to the extent possible.

Here are a few tips for a whistleblower policy:

- Consider the size and structure of the organization
- Specify the parties (within the organization or outside of it) to whom information should be reported
- Have clear procedures for investigating reports and taking action.

Check this resource from Independent Sector for more information:

<https://independentsector.org/programs/principles-for-good-governance-and-ethical-practice/principle-4/>