

Policies

This document describes the policies that WISE abides by.

Volunteer policies

Code of conduct

Team members are expected to:

- Be present for their duties. If not, to inform their lead as promptly as possible.
- Carry out their duties responsibly, safely, and competently.
- Be appropriately dressed for their duties.
- Speak and act respectfully towards ActSEA's team members and stakeholders, especially the communities we work with.
- Respect the privacy and dignity of all whom they come into contact with.
- Provide as much information as possible to enable informed decisions.
- Be impartial and non-judgemental.
- Seek assistance from fellow team members if the matter is beyond their competence. At the same time, seek to acquire the necessary competence.

Team members are expected **not** to:

- Act in any way that may create liability or bring into disrepute ActSEA and its name.
- Use organisation property, resources, information or funds for any purpose other than authorised uses.
- Seek or accept rewards, benefits or gifts without authorisation.
- Engage in any activity that may bring harm (e.g. physical or mental) to another person or property.
- Be under the influence of alcohol and non-prescription drugs while carrying out their work.
- Falsify or change any documents or records.
- Post any photographs or videos on reports, advertisement, promotional material or social media without obtaining permission from ActSEA.
- Act as a spokesperson for ActSEA unless prior permission or authority has been given.
- Mix personal projects, activities or goals with activities they perform on behalf of ActSEA. Information provided to ActSEA should not be used for any non-ActSEA purpose.
- Take advantage of their contacts and relationships with team members and stakeholders to further their own business, religious, political or personal interests.

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| Applicable to | All team members |
| Status | COMPLETE |
| Bahasa Indonesia | CONTENT REQUIRED |

Conflict of interest

Purpose

1. This Conflict of Interest Policy affirms the commitment of Action for Change in Southeast Asia's ("ActSEA") to prevent situations where there may be real, potential or perceived conflicts of interest which may arise. It further affirms the obligations of all members to act in the best interest of ActSEA.
2. Such conflicts may create problems that may result in the following:
 - a. Cause damage to ActSEA's reputation and/or risk the impression that ActSEA has acted improperly, which may lead to its inability to sustain operations;
 - b. Influence the members' judgement and compromise objectivity when conducting ActSEA's affairs; and
 - c. Restrict free discussion, thus resulting in decisions or actions that are not in the best interests of ActSEA.
3. This Policy aims to protect both ActSEA and its members from any impropriety.

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| Applicable to | All team members |
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| Bahasa Indonesia | CONTENT REQUIRED |

Definitions

1. "Member" refers to a board member or management member or staff member or volunteer member of ActSEA.
2. "Policy" refers to the Conflict of Interest Policy.
3. "Interest" means any commitment, investment, relationship, obligation, or involvement, financial or other ActSEA that may influence a person's judgement. This would include:
 - a. Direct interest – ownership in the name of the member/staff;
 - b. Indirect interest – ownership beneficially held through another investment, estate, trust or other intermediary;
 - c. Vested interest – personal stake or involvement, which may or may not include an expectation of financial gain; and
 - d. Deemed interest – a member/staff is deemed to have an interest which their spouse /domestic partner holds an interest.

4. A conflict of interest arises when the personal interests of the member/staff may potentially interfere with the performance of their duties in ActSEA. When actual, potential or perceived conflict of interest arises, the integrity, fairness and accountability of the person may be affected, which could impede the best interest of ActSEA.

Declaration of interests

1. Given the stated purpose of this Policy, the following ought to be adhered to:
 - a. Board and management members to declare their interests, and any gifts or hospitality received in connection with their role in ActSEA; and
 - b. Staff and volunteers to declare when a transaction to be effected may result in a conflict of interest.
2. A [declaration of interests form](#) is provided for this purpose. The types of interest to be declared will include, but not limited to the following:
 - a. Members who have friends or other personal or business relationships must carefully consider whether those relationships create conflicts of interest with their entrusted role in ActSEA. Examples include, but are not limited to:
 - i. Hiring a relative or friend as an employee or vendor,
 - ii. Buying or selling goods or services from / to a family business for which others might compete,
 - iii. Having a personal relationship where there is an immediate reporting relationship,
 - iv. Volunteering and/or having memberships in any other organisations, or
 - v. Receiving goods/services as beneficiaries.
 - b. Members must disclose any outside activities, financial interest or relationship that may pose a real, potential or perceived conflict of interest. Disclosures are to be made to the Board/Core Team/supervisors, with the required approval obtained before accepting any position as an officer or director of an outside business.
3. To be effective, the declaration of interests needs to be updated in written form at least annually and also when any changes occur.
4. In situations where members are unsure on what is to be declared, or whether/when the declaration needs to be updated, they are to err on the side of caution or seek advice from the Board/Core Team/supervisors.
5. All disclosure of interest made by members and decisions made by the Board/Core Team of ActSEA on such matters must be recorded, updated and filed.
6. A register of interests shall also be used to record all gifts of an estimated value over US\$10 received by members.

Operating procedures

1. If the Board needs to make a decision on an issue where a Board member(s) has/have an interest, it is the responsibility of the Board member(s) to:
 - a. Declare the potential conflict of interest, which is to be put on record;
 - b. Abstain from participating in discussion(s) of the program or motion being considered; and
 - c. Abstain from voting on the program or motion being considered.
2. If the Board needs to make a decision on an issue where one or more Board member(s) has /have an interest, it is the responsibility of the Board to ensure that:
 - a. All decisions are made by vote, with a two-thirds majority required based on the presence of a quorum; and
 - b. Interested board members must not vote on matters affecting their own interests.
3. It is the responsibility of the Board to:
 - a. Procure goods and/or services from any vendor if they are the best qualified individuals available, and willing to provide the goods or services needed at the best price.
 - b. The Board's decision shall not be influenced in any way by the fact that a Board member has an interest in the contract.
 - c. Record in the minutes of the Board Meeting the potential conflict of interest, and the use of the procedures and criteria of this policy.
4. It is the sole responsibility of any member of ActSEA to report any possible real, potential or perceived conflict of interest. If it is an oversight of ActSEA, the member shall promptly inform ActSEA that they have been put in such a position of conflict of interest. Except with approval from [insert authority], they shall not participate in any transaction in connection with the conflicted party.
5. No member of ActSEA shall derive any personal profit or gain, directly or indirectly, by reason of their participation with ActSEA. Each individual shall disclose to ActSEA any personal interest which they may have in any matter pending before the organisation and shall refrain from participation in any decision on such matter.
6. Any member of ActSEA or its Consultants / Business Partners shall refrain from obtaining any list of clients for personal or private solicitation purposes at any time during the term of their affiliation. Any such acts are to be reported to the Board.

7. Any member who is also a user of ActSEA's services, or the carer of someone who uses ActSEA's services shall not be involved in decisions that directly affect the service received by them or by the person they care for. They shall declare their interest at the earliest opportunity and withdraw from any subsequent discussion. The same applies if the conflict concerns any other reason(s). This clause does not preclude them from providing feedback on said matter.
8. A member of ActSEA may, however, participate in discussions from which they may indirectly benefit, for example where the benefits are universal to all users.
9. The Board of ActSEA shall have the right to take action, including but not limited to suspending any member/staff from all activities of ActSEA, when it has come to their attention that a potential actual or perceived conflict has arisen, but has not been voluntarily disclosed by the relevant member.

Violations

Any violation will result in discipline, up to and including termination from employment or removal from the board, or expulsion from being a volunteer member of ActSEA.

References

Sample of Conflict of Interest Policy Operating Procedures. Social Service Institute. November 2013. Accessible at: <https://www.charities.gov.sg/PublishingImages/Resource-and-Training/Guides-Templates-Awards/SOP-and-Templates/Documents/SampleConflictofInterestPolicy.pdf>

Discrimination and harassment

ActSEA is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in an atmosphere that is physically and emotionally safe. These policies extend to external stakeholders who conduct themselves in a way that harasses or discriminates against any ActSEA member. ActSEA has a zero-tolerance policy for all forms of harassment or discrimination. Any team member who requires help or is subjected to discrimination or harassment is encouraged to seek assistance early through the pathways described below.

The purpose of these policies is to communicate all staff, trainees, interns, and volunteers' basic responsibility to interact in a respectable manner and contribute to a work environment that is free from harassment and discrimination. These policies also establish our reporting procedures and processes for responding to claims of inappropriate behaviour, discrimination, and perceived harassment, so that issues can be identified and remedied internally, promptly, thoroughly and effectively.

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| Applicable to | All |
| Status | COMPLETE |
| Details | Mechanisms for report and investigating harassment incidents being developed |
| Bahasa Indonesia | CONTENT REQUIRED |

Definitions

Workplace harassment

Workplace harassment can occur when one party within the work environment demonstrates behaviour that causes or is likely to cause harassment, alarm or distress to another party. Such behaviour can violate a person's dignity or create an unfavourable work environment for them, which poses a risk to the person's safety and health. Examples of behaviour that may be considered harassment through any form of communication include but are not limited to:

- Threatening, abusive, or insulting language, comments or other non-verbal gestures
- Stalking

Workplace discrimination

Workplace discrimination occurs when an individual is discriminated against any of the following factors: Age; Sexual orientation; Religion; Sex; Gender identity; Race; Ethnicity; National origin; Mental or physical disability; Genetic information; Relationship to someone who may be discriminated against; Pregnancy or parenthood; Family responsibilities; Political beliefs, etc.

Examples of areas where discrimination may occur through any form of communication include but are not limited to:

- Recruitment
- Compensation
- Promotions
- Assignment of roles and responsibilities

Annex

- [Singapore laws on discrimination and harassment](#)
- [Procedures for investigating an incident](#)
- [Reporting procedures for individuals](#)

All team members are not to participate discriminatory or harassing behaviour within the workplace. In addition, board members, Core Team members, and team/project leads are responsible for ensuring that the team members they work with are not harassed or discriminated against within the workplace or in any scenario related to their work/volunteering with ActSEA.

Reporting and investigation procedures

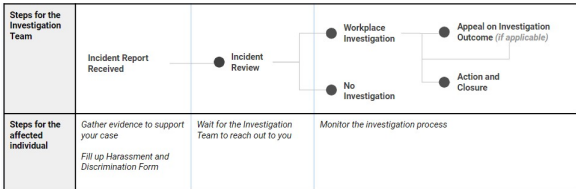
We understand that individuals subject to discrimination or harassment have to do what is best to prioritise their well-being, protect themselves and heal. *ActSEA is in the process of instituting procedures and processes for individuals who wish to seek redress through ActSEA.*

ActSEA has instituted the following procedures and processes for individuals who wish to seek redress through these channels. We understand that individuals subject to discrimination or harassment have to do what is best to prioritise their well-being, protect themselves and heal. Confidentiality will be maintained throughout the investigation procedure. If you feel that the following procedures could be improved, please reach out to us through the [ActSEA Feedback Form](#).

If you prefer to utilise third-party channels to seek redress, we have included some resources below.

It should be noted that these processes may not be appropriate in every circumstance. Therefore, the processes should be considered flexible and modified by the investigation team as appropriate to the situation.

Overview of procedure and processes



If you are looking to report an incident, refer to the ["Procedures for report an incident"](#) page. If you are part of the investigation team, please refer to the ["Procedures for investigating an incident"](#) page.

References

Sample policies

- [Discrimination Policy and Review Procedure \(Harvard University\)](#)
- [Equal Employment Opportunity and Affirmative Action Policy Statement \(Coca-Cola Company\)](#)
- [Equal opportunity, Anti-Discrimination and Anti-Harassment Statement \(JP Morgan Chase\)](#)
- [Policy on a Victim-Centred Approach in UNHCR's Response to Sexual Misconduct](#)
- [Nondiscrimination/Anti-Harassment Policy and Complaint Procedure \(SHRM\)](#)
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- [Termination \(Ministry of Manpower\)](#)

Government guidelines

- [Tripartite Advisory on Managing Workplace Harassment \(Ministry of Manpower\)](#)
- [TAFEP Workplace Harassment Resource and Recourse Centre](#)

Resources

- [Types of discrimination in the workplace \(liveaboutdotcom\)](#)

Non-disclosure

All data, materials, knowledge and proprietary information generated through, originating from or having to do with ActSEA or persons associated with ActSEA's activities, including contractors, participants, other team members, is to be considered confidential information and is not to be disclosed to any outside party without the written consent of ActSEA. This includes but is not limited to, documents, information, designs, printed matters, policies, procedures, conversations, messages (received or transmitted), resources, contacts, email lists, and email messages, whether internally between team members or outside ActSEA is considered confidential and the sole property of the ActSEA.

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| Applicable to | All team members |
| Status | COMPLETE |
| Bahasa Indonesia | CONTENT REQUIRED |

Any disclosure, misuse, copying or transmitting of any material, data, or information, whether intentional or unintentional, resulting in the detriment to ActSEA or persons associated with its activities, will subject the team member to disciplinary action, prosecution, and/or monetary damages according to the procedures set by ActSEA and any applicable laws.

Termination (Volunteers)

The Volunteer is under no obligation to provide any services to ActSEA and is free to discontinue their volunteer activities at any time. ActSEA may terminate any volunteer relationship at any time without cause or prior notice and at its sole discretion.

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| Applicable to | Volunteers |
| Status | COMPLETE |
| Bahasa Indonesia | CONTENT REQUIRED |

Staff policies

[TBC] Time-off / Leave

Self-managed time-off policy

ActSEA has an unlimited time-off policy. There is no pre-approval required, and employees and interns are strongly encouraged to take as much time off needed to care for well-being of themselves and their loved ones (minimum 14 days per annum). However:

- If the Employee/Intern will not be contactable for a period significant enough to affect their duties, the Core Team should be informed by Slack or email
- If the Employee/Intern will require duties to be covered by someone else, the Employee /Intern should notify the Core Team by Slack or email

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| Applicable to | Staff and interns only |
| Status | COMPLETE |
| Bahasa Indonesia | CONTENT BEING DRAFTED |

Family leave

The Employee/Intern will be entitled to all government-mandated family leave (maternity, paternity, childcare, etc). If additional time off is needed, please refer to the time-off policy.

Public holidays

The Employee/Intern will be entitled to all official public holidays in their country of residence on full salary/allowance.

Code of conduct

Team members are expected to:

- Be present for their duties. If not, to inform their lead as promptly as possible.
- Carry out their duties responsibly, safely, and competently.
- Be appropriately dressed for their duties.
- Speak and act respectfully towards ActSEA's team members and stakeholders, especially the communities we work with.
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Conflict of interest

Purpose

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3. It is the responsibility of the Board to:
 - a. Procure goods and/or services from any vendor if they are the best qualified individuals available, and willing to provide the goods or services needed at the best price.
 - b. The Board's decision shall not be influenced in any way by the fact that a Board member has an interest in the contract.
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4. It is the sole responsibility of any member of ActSEA to report any possible real, potential or perceived conflict of interest. If it is an oversight of ActSEA, the member shall promptly inform ActSEA that they have been put in such a position of conflict of interest. Except with approval from [insert authority], they shall not participate in any transaction in connection with the conflicted party.
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| Applicable to | All |
| Status | COMPLETE |

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Annex

- [Singapore laws on discrimination and harassment](#)
- [Procedures for investigating an incident](#)
- [Reporting procedures for individuals](#)

Reporting and investigation procedures

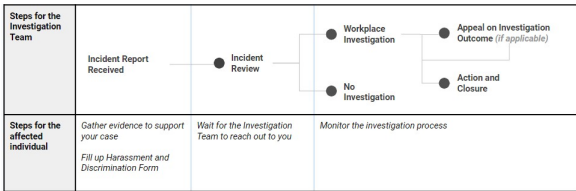
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Government guidelines

- [Tripartite Advisory on Managing Workplace Harassment \(Ministry of Manpower\)](#)
- [TAFEP Workplace Harassment Resource and Recourse Centre](#)

Resources

- [Types of discrimination in the workplace \(liveaboutdotcom\)](#)

Insurance

Indonesia

Insurance programs

The Employee/Intern is expected to enrol themselves in Indonesia's National Healthcare Insurance Program (BPJS Kesehatan) or an equivalent program based on his/her personal judgement. The Employee/Intern's immediate family may also be covered.

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| Applicable to | Staff and interns only |
| Status | COMPLETE |
| Bahasa Indonesia | TO REVIEW |

Insurance premiums

The Employee/Intern may seek reimbursement for insurance premiums from ActSEA throughout their period of service, subject to approval from ActSEA.

Singapore

Group insurance plan

ActSEA does not have a group insurance plan.

For interns and trainees who will be contracted with ActSEA for at least two months and working at least 20 hours per week, ActSEA will reimburse up to S\$20 per person to purchase insurance from [SN ACK by Income](#).

Medical consultation fees

The Employee/Intern should seek reimbursement for medical consultation fees from ActSEA if they fulfil the following criteria:

- The Employee/Intern have worked for at least 3 months with ActSEA
- The medical consultation results in at least one day of paid sick leave, and
- The Employee/Intern receives a medical certificate issued by a medical practitioner from a public medical institution.

The Employee/Intern will not be eligible to claim reimbursement for medical consultation fee if they fall sick during public holidays, annual leave, rest days or non-working days under the Employment Act.

The Employee/Intern may still seek reimbursement for medical consultation fees and other medical fees from ActSEA throughout their period of service, subject to approval from ActSEA.

Non-disclosure

All data, materials, knowledge and proprietary information generated through, originating from or having to do with ActSEA or persons associated with ActSEA's activities, including contractors, participants, other team members, is to be considered confidential information and is not to be disclosed to any outside party without the written consent of ActSEA. This includes but is not limited to, documents, information, designs, printed matters, policies, procedures, conversations, messages (received or transmitted), resources, contacts, email lists, and email messages, whether internally between team members or outside ActSEA is considered confidential and the sole property of the ActSEA.

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| Applicable to | All team members |
| Status | COMPLETE |
| Bahasa Indonesia | CONTENT REQUIRED |

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Performance reviews

Appraisal

There is no formal performance appraisal system. However, all members are expected to have frequent and informal conversations with other members of the organisation to assess themselves, set individual performance goals and seek support from their colleagues to achieve these goals.

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| Applicable to | Staff |
| Status | COMPLETE |
| Bahasa Indonesia | TO REVIEW |

Salaries

ActSEA is committed to providing compensation in line with our vision, mission, and values, while remaining in compliance with applicable laws and regulations. This policy aims to set out the principles and approaches by which the organisation will determine the salaries of paid staff.

Principles

The salaries of ActSEA staff should reflect the following principles.

Equity

Most companies pay their top executives significantly more than their subordinates. For example, it was reported in 2019 that the chief executive of Singapore's state investment firm Temasek Holdings earned US\$1.6m per year ([Bloomberg, 2019](#)), or approximately US\$130,000 per month. In contrast, the country's Progressive Wage Model (PWM) for the cleaning sector mandates that general cleaners should earn a minimum monthly basic salary of S\$1,236 as of June 2021 ([Ministry of Manpower, 2021](#)).

Wage inequality contributes towards widening wealth disparities, which we believe is especially inequitable when there are about 150 million people around the world living in poverty ([World Bank, 2021](#)), including in the countries that ActSEA is active in. In Indonesia, the wealth gap has grown faster than in any other country in Southeast Asia. The four richest men in Indonesia have more wealth than the combined total of the poorest 100 million people ([Oxfam, 2020](#)).

| Country | Wealth Gini coefficient (2019) | World ranking |
|-----------|--------------------------------|---------------|
| Indonesia | 0.833 | 11 |
| Cambodia | 0.757 | 64 |
| Singapore | 0.718 | 99 |

Paying unfairly unequal wages would make ActSEA complicit in the structures that contribute to wealth inequality and poverty.

All roles are equally valuable

There are many arguments that institutions make to justify disparities in income. One argument is that salaries reflect the value that a person brings to the company, based on the position's responsibilities and the person's experience and qualifications. The implication is that, generally, occupations that are seen to be more 'skilled' are valued more highly by society than occupations that involve manual labour.

However, economists such as [Jason Hickel](#) have pushed back against this idea:



Jason Hickel 
@jasonhickel

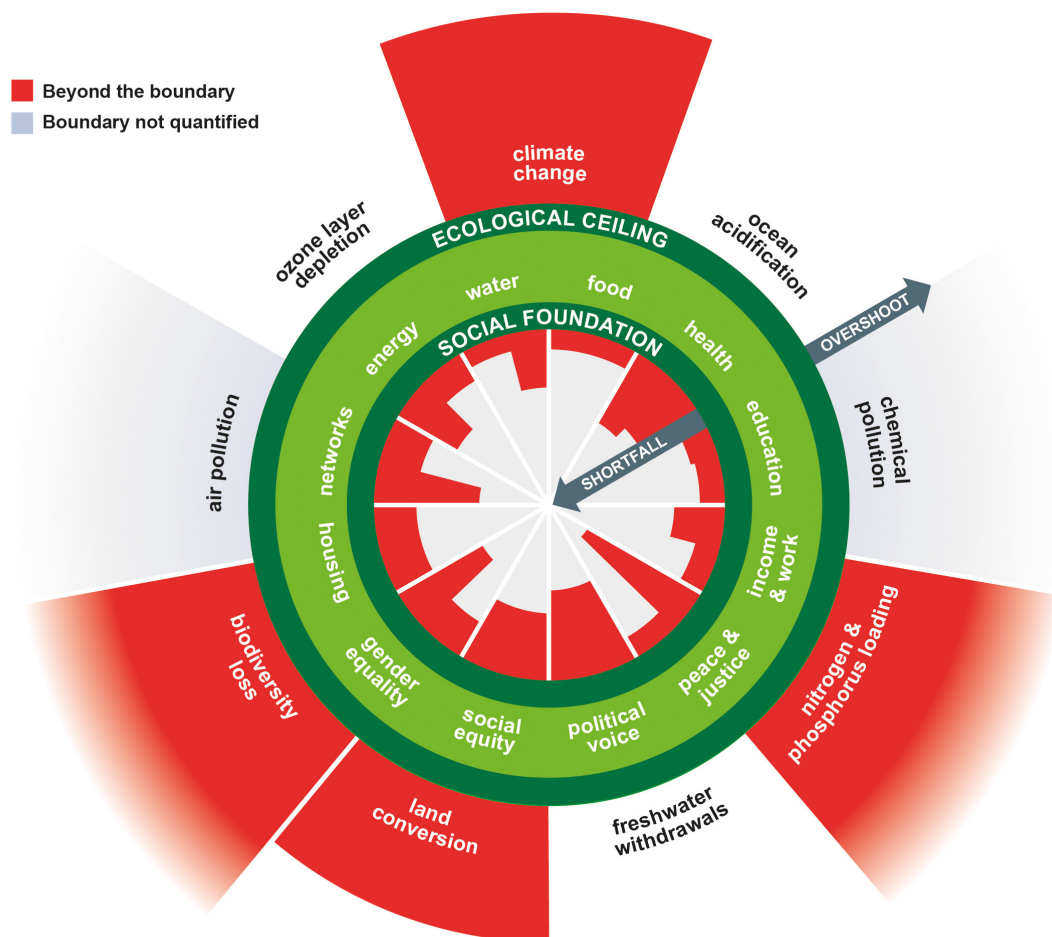
The notion that one's income reflects their productivity, or the value they contribute to society, is one of the most pernicious fallacies of neoclassical economics.

4:48 pm · 8 Jun 2021

We believe that every individual's contribution is equally valuable, regardless of the nature of their role and the amount of experience and skills they bring to the organisation. Therefore, our position is that the role and the person's experience and qualifications should not factor into a person's salary at ActSEA.

Sustainability

Greater affluence has increased resource use and pollutant emissions far more rapidly technology has helped to reduce them. Affluent people are responsible for most environmental impacts ([Wiedmann et al, 2020](#)). We subscribe to the doughnut model of social and planetary boundaries ([Raworth, 2017](#)) which illustrates our challenge to meet life's essentials while not overshooting our pressure on Earth's life-supporting systems. We also believe in degrowth, which advocates for societies to prioritise social and ecological well-being instead of corporate profits, over-production and excess consumption ([Konzeptwerk Neue Ökonomie](#)).



ActSEA's salaries should reflect our commitment to sustainability by ensuring that the amount we pay does not enable excessive consumption. For example, as transportation accounts for around one-fifth of global carbon dioxide (CO₂) emissions ([Climate Watch, 2021](#)), our salaries should not enable our staff to travel constantly.

However, we also recognise that some consumption is necessary to achieve physical and mental well-being. In addition, individuals contribute far less towards climate change than corporations. A study in 2017 found that just 100 companies were responsible for 71% of global emissions (CDP, 2017). Therefore, **ActSEA should not deny team members the opportunity to consume goods and services if it is beneficial to their well-being.**

Rights

Every person has the right to a life with dignity. Among the rights recognised in the Universal Declaration of Human Rights (United Nations), this includes a standard of living adequate for the health and well-being of themselves and their family, including food, clothing, housing and medical care and necessary social services.

ActSEA's salaries must ensure that staff are able to live a life of dignity, including and especially if the state institutions do not ensure these rights. For example, Singapore does not have a minimum wage, but this will not mean that ActSEA can pay staff in Singapore as low as possible.

Community

One of ActSEA's values is caring for and supporting one another. This means that we not only care for our team members, but also their loved ones and wider community. We recognise that making a difference is not restricted to the people we work with through our external programmes, but should also extend to our team members.

Therefore, to the best of our ability, ActSEA's salaries should allow staff to support their loved ones health and well-being, including education, especially if other forms of support are not available. It should also allow staff to contribute towards causes that they believe in.

Transparency

We recognise that not disclosing salaries and how they are determined contributes to the gender and racial pay gap (Bolden-Barrett & Clarey, 2018; Afoko, 2017). ActSEA is committed to being fully transparent about what our salaries are and how they are calculated. However, breakdown of calculations of each individual's salaries will not be provided in order to respect the staff's privacy.

Approach

In order to operationalise these principles, we propose the following approach.

1. Each staff member will put together a monthly budget comprising a full list of ongoing expenses, including their own health and well-being needs, what they need to support their loved ones and family, and community causes that they wish to support. Savings and taxes should be included.
2. Based on their individual financial circumstances, they will identify which expenses that ActSEA must cover, and which expenses that ActSEA should try their best to cover depending on ActSEA's financial situation. This will help ActSEA determine how much to fundraise.
3. In addition to the monthly budget, each member will identify one-off expenses that they would like to spend in the coming year.
4. The staff will come together to discuss each other's budgets, and come to an agreement on: (a) how much salary each staff must and should receive; (b) how much allowance should be set aside over the coming year on one-off expenses. The agreement should take into account ActSEA's financial health.
5. The proposed salaries and allowances will be submitted to the Core Team and Board for approval.

Challenges

The proposed approach will require staff to be completely open about their personal lives. We recognise that staff have a right to privacy and we should not pressure staff to disclose information they are not comfortable with. To respect staff's privacy, the approach will incorporate the following elements.

- Staff do not have to complete full details of medical expenses if they do not want to. Other team members will not question the validity of these expenses.
- Staff will be allowed a percentage of discretionary spending to use on anything they want. This will be a percentage proposed by the staff depending on ActSEA's financial situation.

Sick leave

Paid sick leave

Full-time employees and interns will be entitled to paid sick leave not exceeding:

- 14 days in each year if no hospitalisation is necessary; or
- 60 days (less non-hospitalization medical leave) in each year if hospitalisation is necessary.

Part-time employees and interns entitlements are to be pro-rated accordingly.

| | |
|-------------------------|------------------------|
| Applicable to | Staff and interns only |
| Status | COMPLETE |
| Bahasa Indonesia | TO REVIEW |

Additional sick leave

If the Employee/Intern requires additional sick leave, the Employee/Intern should discuss a suitable arrangement with the Core Team.

Notification

The Employee/Intern is to notify ActSEA as soon as possible in case of their absence from work through illness if the Employee/Intern will be uncontactable for one or more working days. Although certification of their sick leave by the organisation's doctor or a Government doctor or any other certified medical practitioner or medical officer is not necessary, the Employee/Intern is encouraged to seek qualified medical advice if they are ill.

Termination (Staff)

Notice

The Employee/Intern may at any time terminate this Agreement and their service by giving not less than two weeks written notice to ActSEA, or payment in lieu of notice.

ActSEA may terminate this Agreement and the Employee/Intern's service at any time, without notice or payment in lieu of notice, for sufficient cause, including but not limited to misconduct, theft, fraud.

Property

The Employee/Intern agrees to return any property of the organisation at the time of termination, including but not limited to computers, company records, paperwork and documents, and business cards.

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| Applicable to | Staff |
| Status | COMPLETE |
| Bahasa Indonesia | TO REVIEW |