Code of Conduct Policy

1. Scope
Sight For All Board Directors, staff, Visionaries, Fellows, Ophthalmic Country Officers and volunteers are required to observe the highest possible standards of behaviour, ethics and integrity as a condition of their employment or engagement with the organisation.

For the purpose of this policy, the term ‘Sight For All representative’ includes: Board Directors, staff, Visionaries, Fellows, Ophthalmic Country Officers, project participants, contractors, consultants and volunteers.

This policy applies to all Sight For All representatives and a copy is provided to all upon engagement. The policy is also available for public view on the Sight For All website. In addition to abiding to this policy, all Sight For All representatives are required to abide by the Australian Council for International Development (ACFID) Code of Conduct.

2. Purpose

The purpose of this Code of Conduct Policy is to:
- Enable a high standard of practice by Sight For All representatives at all times
- Ensure activities and partner relationships are aligned with our values, vision and mission
- Ensure safety and protection of all involved with Sight For All activities, including children and those in vulnerable situations
- Ensure best practice, always.

3. Values and Expected Behaviour

Values
Sight For All’s core values are Respect, Collaboration, Sustainability

The expected behaviour of all Sight For All representatives includes but is not limited to:
- Acting in a manner consistent with Sight For All’s human rights approach, recognising that human rights are for everyone regardless of race, religion, ethnicity, age, disability, gender, sexual orientation, class or socio-economic status
- Treating all people with respect, fairness and dignity
- Observing and practicing the highest possible standards of behaviour, ethics and integrity
- Complying with all Sight For All policies, procedures, rules and contractual obligations
- Adhering to appropriate codes of practice and/or ethics (such as accounting standards)
- Adhering to the confidentiality of any information, records or other sensitive material acquired during the course of engagement with Sight For All and/or after the cessation of engagement
- The proper and intended use of, and respect for, Sight For All equipment, information, electronic systems, supplies and property (including intellectual property)
- Respecting individual's human rights and not discriminating based on gender, race, religion, sexual orientation, nationality, religion, physical or mental disability, age, social origin or political opinion
- Encouraging participation, and providing all people with the right to free, meaningful and active participation in making decisions that affect their human rights
- Encouraging and facilitating partnerships that are sustainable beyond the scope of the activities being conducted
- Firmly committing to the provision of equal treatment of and opportunities for all
- Using appropriate language in all communications, respecting the needs, rights and dignity of project beneficiaries
- Complying with all industry, international development and legal requirements in Australia and internationally
- While in-country, respecting the laws and values of the host country
- Encouraging empowerment of representatives, stakeholders and partners
• Complying with all reasonable and lawful instructions and decisions made by the Board of Directors
• Not possessing, distributing, selling, consuming or being under the influence of drugs or alcohol while in the workplace
• Strictly observing workplace health and safety rules, responsibilities and practices at all times
• Disclosing criminal offences that may occur during engagement with Sight For All.

4. Child Protection

Sight For All has a zero-tolerance approach to child abuse and exploitation. All actions concerning children are undertaken with the best interests of the child as the primary consideration. In ensuring the utmost protection of children at all times, Sight For All representatives are required to uphold the following behaviour:

• Not using language or behaviour towards children or adults that is inappropriate, harassing, abusive, sexually provocative, intended to humiliate, demeaning or culturally inappropriate
• Not engaging children and/or vulnerable persons in any form of sexual activity or acts, including paying for sexual services or acts
• Not engaging anyone unwillingly in any form of sexual activity or acts
• Wherever possible ensuring that another adult is present when working in the proximity of children and/or vulnerable persons
• Not visiting a child or vulnerable person’s home alone or invite unaccompanied children or vulnerable persons into their home or accommodation, unless they are at immediate risk of injury, harm or in physical danger
• Not sleeping close to an unsupervised child, children or vulnerable person 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)
• Not using any form of physical punishment on children or vulnerable people
• Not doing things of a personal nature that a child or vulnerable person can do for themselves e.g. toileting, dressing or touching children or a vulnerable person in an inappropriate way
• Not using any electronic equipment, including computers, mobile phones, video cameras or social media inappropriately and never exploiting or harassing children or accessing other child exploitation material through any medium
• Not hiring children for domestic or other labour which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury
• Not condoning or participating in any child related activity which is illegal, unsafe or abusive
• Being aware of behaviour and avoiding actions or behaviours that could be perceived by others as child exploitation or abuse
• Immediately reporting concerns or allegations of child abuse and exploitation in accordance with the Sight For All Child Protection Policy and any relevant legislative reporting requirements

As outlined in Sight For All’s Child Protection Policy and Vulnerable Person’s Code of Conduct, Sight For All representatives are to ensure that when photographing or filming a child or using an image for work-related purposes, they will:

- Gain consent from the child and their guardian or parent prior to taking images, and ensure that they understand how the images will be used
- Have assessed and endeavour to comply with local traditions and restrictions for the reproduction of images
- Ensure that photographs and film content depict children in a dignified and respectful manner and not in a submissive or vulnerable manner. Children will be adequately clothed and not in poses that could be viewed as sexually suggestive
Ensure that images are an honest representation and related to the work undertaken by Sight For All in the context of the setting
Ensure that file labels/text relating to images do not reveal identifying information about the child when sending images electronically or using the images in a form such as publications or social media
Follow the requirements as set out in the Sight For All Personal Image Consent Procedure and use the Sight For All Personal Image Consent Form.

5. Prevention of Sexual Exploitation, Abuse and Harassment
Sight For All does not tolerate sexual exploitation, abuse or harassment of any kind. Sexual exploitation, abuse or harassment by or towards any Board Director, staff member, Fellow, project participant, Ophthalmic Country Officer, Visionary, volunteer, contractor, supplier, customer or patient will not be tolerated under any circumstances.
It is the expectation that Sight For All representatives observe the highest possible standards of behaviour, ethics and integrity as a condition of their engagement with the organisation.
The Sight For All Board of Directors is committed to providing strong leadership and a culture where sexual exploitation, abuse and harassment is not tolerated.
Sight For All takes a survivor centred approach and plays an active role in preventing sexual exploitation, abuse and harassment in all business activities.

In ensuring the prevention of sexual exploitation, abuse and harassment at all times, Sight For All representatives are required to uphold the following behaviour:

- Treating all people (children and adults) with respect regardless of their age, race, colour, gender, language, religion, opinions, nationality, ethnicity, social origin, property, disability or other status
- Not using language or behaviour towards children or adults that is inappropriate, harassing, abusive, sexually provocative, intended to humiliate, demeaning or culturally inappropriate
- Not exploiting the vulnerability of others, particularly women, children and those who are vulnerable
- Understanding that no one should ever be put in a compromising position
- Never requesting or accepting money, goods or services for sex, including humiliating or degrading sexual behaviours
- Not engaging in paying for sexual services
- Not engaging anyone unwillingly in any form of sexual activity or acts
- Being aware of behaviour and avoid actions or behaviour that could be perceived by others as sexual exploitation or abuse
- Not committing any form of harassment
- Understanding what constitutes harassment and bullying and take appropriate steps to report it
- Not abusing the position within Sight For All at the expense of or to the detriment of others
- Reporting any known or suspected cases of sexual exploitation, abuse or harassment
- Maintaining utmost confidentiality by not revealing any survivors of sexual exploitation, abuse or harassment
- Complying with all relevant Australian and local legislation, pertaining to the country in which Sight For All activities are being conducted. This includes during travel and includes labour laws in relation to child labour and the protection of vulnerable people
- Not forming a physical relationship with another Visionary, Fellow or local person, to avoid any risk of power imbalances
- Not engaging in any fraternisation while engaged in direct delivery of DFAT project activities
6. Fraud and Corruption

All Sight For All representatives have a responsibility to act in an ethical, transparent and honest manner to achieve Sight For All’s Vision, Mission and intended outcomes.

In maintaining practices that are free of fraud and corruption, Sight For All representatives are required to:

- Report any conflicts of interest (as noted at each Sight For All Board meeting)
- Maintain transparent and ethical financial practices, abiding by requirements of the Delegations of Authority Policy
- Never deliberately supporting individuals involved in fraudulent or criminal activities
- Never put themselves, others or the organisation in a vulnerable position by not following due diligence processes
- Never destroy or falsify documents, make false statements during investigations or impede investigations
- Uphold the highest standard of professionalism, transparency, accountability and compliance in relation to governance, finance and general operations.

7. Circulation of Policy

Sight For All ensures representatives are aware of this Code of Conduct Policy by:

- All representatives must read and sign the policy upon engagement with Sight For All
- The policy is shared with partners via project agreements
- The policy is shared with Visionaries, Fellows, project participants, staff and Board Directors via Good Development Practice Workshops
- The policy is available on the Sight For All website.

8. ACFID Code of Conduct

Sight For All is a Member of the Australian Council for International Development (ACFID). ACFID is the peak council of Australian non-government organisations and has a key purpose of ensuring members practice the highest level of ethical standards and observe the ACFID Code of Conduct.

As a Member of ACFID, Sight For All complies with the Commitments outlined in the Code of Conduct. This includes:

- We respect and protect human rights
- We promote the participation of all primary stakeholders
- We seek durable and lasting improvements in the circumstances and capacities of primary stakeholders
- We contribute to systemic change
- We respect and understand those with whom we collaborate
- We are truthful in our communications
- We meet our legal and compliance obligations
- We are accountable to our stakeholders
- We ensure that funds and resources entrusted to us are properly controlled and managed.

9. Breaching this Code of Conduct

A Sight For All representative who suspects or becomes aware that this Code of Conduct may be being breached must report the matter to the Chairman of the Board or Executive Officer immediately.

If the breach relates specifically to child protection, or sexual exploitation, abuse or harassment, the Sight For All representative is required to comply with the reporting obligations as outlined in those policies.

Where a Sight For All representative is unsure of their own conduct in relation to the operation of this Code of Conduct Policy, they must bring the matter to the attention of the Chairman of the Board or
Executive Officer. This will enable a discussion and clarification of this policy and its application to their particular circumstances, as soon as they become aware of a breach or a potential breach.

Sight For All staff, Visionaries, volunteers or Ophthalmic Country Officers may be suspended during an investigation process. Sight For All believes in natural justice and does not presume guilt or innocence throughout an investigation process.

Visionaries Ophthalmic Country Officers or volunteers who are in breach of this Code of Conduct Policy may not be invited back to participate in future Sight For All projects.

Employees in breach of this Code of Conduct will be managed in line with their employment contracts and as per sanctions sections of the Child Protection and PSEAH Policies. Where Fellows or project participants are in breach of this Code of Conduct Policy, the Chairman and Executive Officer will have an initial discussion with the Director of the partner hospital regarding disciplinary action.

10. Related Documents
   - Sight For All Anti-Fraud and Corruption Policy
   - Sight For All Child Protection Policy
   - Sight For All Complaints Handling Policy
   - Sight For All Governance Policy
   - Sight For All Human Resources Policy
   - Sight For All Prevention of Sexual Exploitation, Abuse and Harassment Policy
   - Sight For All Safeguarding Policy
   - Sight For All Volunteer Policy
   - Sight For All Whistleblower Policy

11. Review
   The Sight For All Code of Conduct Policy is reviewed on an annual basis.

12. Acknowledgement
   I acknowledge that I have read, understood and retained a copy of Sight For All’s Code of Conduct Policy.

   I further acknowledge that as a representative of Sight For All I will adhere to this code.

   Signed: ___________________________________

   Position: ________________________________

   Date: ________________________________

---

Sight For All Code of Conduct Policy June 2021
Approved by the Board of Directors 28.6.2021
Version 8.0
<table>
<thead>
<tr>
<th>Document Name</th>
<th>Version #</th>
<th>Date Approved</th>
</tr>
</thead>
<tbody>
<tr>
<td>Code of Conduct Policy</td>
<td>1</td>
<td>1 April 2014</td>
</tr>
<tr>
<td>Code of Conduct Policy</td>
<td>2</td>
<td>3 February 2015</td>
</tr>
<tr>
<td>Code of Conduct Policy</td>
<td>3</td>
<td>2 February 2016</td>
</tr>
<tr>
<td>Code of Conduct Policy</td>
<td>4</td>
<td>29 March 2016</td>
</tr>
<tr>
<td>Code of Conduct Policy</td>
<td>5</td>
<td>12 January 2018</td>
</tr>
<tr>
<td>Code of Conduct Policy</td>
<td>6</td>
<td>28 May 2019</td>
</tr>
<tr>
<td>Code of Conduct Policy</td>
<td>7</td>
<td>17 November 2020</td>
</tr>
<tr>
<td>Code of Conduct Policy</td>
<td>8</td>
<td>26 June 2021</td>
</tr>
</tbody>
</table>