

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.

Sight For All uses the definitions of child: as a person being 15 years of age or under and a young person as aged 16-17 years.

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 purpose
- Ensure safety and protection of all involved with Sight For All activities, including children and young people, 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, Equity and Excellence.

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 or when representing Sight For All
- 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 abuse and exploitation of children and young people. All actions concerning children and young people are undertaken with the best interests of the child or young person as the primary consideration.

In ensuring the utmost protection of children and young people at all times, Sight For All representatives are required to uphold the following behaviour:

- Not using language or behaviour towards children and young people or adults that is inappropriate, harassing, abusive, sexually provocative, intended to humiliate, demeaning or culturally inappropriate
- Not engaging children and young people and/or vulnerable persons in any form of sexual activity or acts, including paying for sexual services or acts
- Not engaging anyone in any form of sexual activity or acts
- Wherever possible ensuring that another adult is present when working in the proximity of Children and young people and/or vulnerable persons
- Not visiting a child or young person, or a vulnerable person's home alone or invite unaccompanied children and young people, 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, or young person, or a 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 transporting a child or young person in a vehicle of any kind, unless accompanied by another adult
- Not using any form of physical punishment on children and young people or a vulnerable person
- Not doing things of a personal nature that a child or young person, or a or vulnerable person can do for themselves e.g. toileting, dressing or touching a child or young person, or a 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 young people or accessing other child exploitation material through any medium
- Not hiring children or young people 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 abuse and exploitation of children and young people.
- Immediately reporting concerns or allegations of abuse and exploitation of children and young people. in accordance with the Sight For All Child and Young Person Protection Policy and any relevant legislative reporting requirements

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

- Gain informed consent from the child or young Person 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 and young people in a dignified and respectful manner and not in a submissive or vulnerable manner. Children and young people 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 and young person 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, young people 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, young people 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
- Having zero engagement of any sexual activity or acts with children or young people
- 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
- Understanding that not abiding by the behaviours outlined in this policy will result in the termination of employment or disengagement with Sight For All.

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. Reporting

Sight For All's Child and Young Person Protection, PSEAH and Anti-Fraud and Corruption Policies outline the specific reporting requirements for allegations of, suspected or actual acts of abuse and exploitation of children and young people, exploitation, abuse or harassment or acts of fraud. This includes detail of specific reporting requirements for projects where DFAT funding is used. Specific reporting forms are also included in each policy. Sight For All's Incident Investigation and Reporting Policy also outlines specific reporting requirements.

8. 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
- Completion of the Good Development Practice Assessment
- The policy is available on the Sight For All website.

9. 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.

10. 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 Chair of the Board or Chief Executive Officer immediately.

If the breach relates specifically to child and young person 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 Chair of the Board or Chief 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.

Where the Sight For All Code of Conduct Policy has been breached, the individual will immediately be suspended from their role during the period of the breach investigation, or where there may be a potential risk to an individual's safety. Such action is taken as a matter of precaution and does not presume guilt or innocence throughout the investigation process. Sight For All will follow the specific reporting requirements of DFAT for anywhere DFAT funding is involved.

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 and Young Person Protection and PSEAH Policies. Where Fellows or project participants are in breach of this Code of Conduct Policy, the Chair and Chief Executive Officer will have an initial discussion with the Director of the partner hospital regarding disciplinary action. In confirmed breaches of this Code of Conduct Policy, the Vulnerable Person's Code of Conduct, Child and Young Person Protection Policy or PSEAH Policy following a thorough investigation, the individual will not be permitted to have any further involvement with Sight For All.

11. Related Documents

Sight For All Anti-Fraud and Corruption Policy_V10_February 2022

Sight For All Child and Young Person Protection Policy_V12_August 2023

Sight For All Complaints Handling Policy_V10_February 2022

Sight For All Governance Policy_V4_November 2021

Sight For All Human Resources Policy_V8_September 2021

Sight For All Human Rights Policy_V5_February 2022

Sight For All Incident Investigation and Reporting Policy_V6_November 2021

Sight For All Prevention of Sexual Exploitation, Abuse and Harassment Policy_V4_November 2021

Sight For All Safeguarding Policy_V2_September 2021

Sight For All Volunteer Policy_V5_November 2021

Sight For All Vulnerable Persons Code of Conduct_V6_March 2022

Sight For All Whistleblower Policy_V3_February 2021

ACFID Code of Conduct (www.acfid.asn.au/code-of-conduct)

12. Review

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

13. 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 August 2023

Approved by the Board of Directors 8.8.2023

Version 10.0

Document Revision History		
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Code of Conduct Policy	1	1 April 2014
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Code of Conduct Policy	3	2 February 2016
Code of Conduct Policy	4	29 March 2016
Code of Conduct Policy	5	12 January 2018
Code of Conduct Policy	6	28 May 2019
Code of Conduct Policy	7	17 November 2020
Code of Conduct Policy	8	26 June 2021
Code of Conduct Policy	9	14 June 2022
Code of Conduct Policy	10	8 August 2023