



GP 05

Code of Ethics, Conduct, and Confidentiality

Classification:	Governance & Safeguarding Policy
Responsible Authority:	Safeguarding Focal Point, Programs Managers
Executive Sponsor:	Executive Director
Approval Authority:	Board of Directors
Date First Approved:	2023-04-10
Date Last Reviewed:	2024-12-01
Mandatory Review Date:	2025-01-15

PURPOSE

This policy defines SEEN for Gender and Sexual Equity's ethical principles, expected standards of conduct, and commitments to confidentiality.

It establishes clear rules and responsibilities for everyone engaged with SGSE.

SCOPE

This policy applies to all incidents of sexual harassment, exploitation, or abuse, regardless of when or where they occur, provided they involve: Members of SEEN's General Assembly or Board of Directors, Employees (full-time, part-time, or contract-based), Volunteers, interns, and trainers, Current and prospective service providers, Partner organizations and sub-grant recipients and any individual under a contractual agreement with SEEN.

The principles of this policy apply at all times, including outside working hours and during leave periods, with no exceptions.

DEFINITIONS

Word/Term	Definition
Code of Ethics	A set of core values and guiding principles that reflect SEEN's commitment to human rights, equity, dignity, and justice in all its actions.
Code of Conduct	A set of standards and rules that define the expected behavior of anyone representing SEEN, ensuring respect, accountability, and inclusivity.
Confidentiality	The obligation to protect personal, organizational, and sensitive information from unauthorized access, use, or disclosure.
Conflict of Interest	A situation where an individual's personal, financial, or professional relationships may interfere with their ability to act in SEEN's best interest.
Sensitive Information	Any information that, if disclosed, could put an individual or the organization at risk. This includes gender identity, sexual orientation, health records, financial details, and legal information.
Breach of Conduct	Any action, omission, or behavior that violates this policy, SEEN's safeguarding framework, or applicable laws.



POLICY

SEEN for Gender and Sexual Equity commits to:

- Upholding its ethical values in all actions and relationships.
- Providing a safe, inclusive, and respectful environment for staff, beneficiaries, partners, and stakeholders.
- Ensuring confidentiality of all personal and organizational information.
- Preventing, responding to, and addressing misconduct, including harassment, discrimination, exploitation, and abuse.

PROCEDURE

<u>Action</u>	<u>Responsibility</u>
1. Orientation and Training	
1.1 Include this policy in onboarding sessions for all new staff, volunteers, consultants.	Safeguarding Focal Point And/or HR And/or Department Leads
1.2 Integrate policy awareness into capacity-building workshops and team meetings.	Safeguarding Focal Point And/or HR And/or Department Leads
2. Confidentiality Management	
2.1 Classify and label sensitive documents and personal data.	IT and HR And/or Department Leads
2.2 Store sensitive information in secure, access-controlled systems.	All members
2.3 Obtain explicit written consent before sharing any personal or organizational data externally.	All members
2.4 Train all staff and volunteers in data protection and digital security protocols.	IT and HR And/or Department Leads and Project managers
3. Reporting Violations	
3.1 Provide multiple safe, accessible, and confidential reporting channels (email, hotline, safeguarding focal point).	HR And/or Department Leads
3.2 Ensure that no retaliation occurs against any person who reports misconduct in good faith.	Executive Director
3.3 Allow anonymous reporting where required to protect the individual's safety.	Investigation Committee
4. Investigation and Response	
4.1 Acknowledge receipt of the report within 48 hours.	Safeguarding Focal Point



4.2	conduct a risk assessment to determine the severity and urgency of the case.	Investigation Committee
4.3	Interview involved parties confidentially and document findings.	Investigation Committee
4.4	Prepare a formal report summarizing findings, recommended actions, and timelines.	Investigation Committee
4.5	Implement corrective measures, which may include, Additional training and capacity building, Formal written warnings, Termination of contracts or partnerships, Referral to legal authorities (if required)	Board of Directors & Executive Director
5.	Review and Continuous Improvement	
5.1	Review this policy every two years or when triggered by significant incidents.	Board of Directors
	Gather feedback from staff, volunteers, beneficiaries, and partners to strengthen the policy.	HR And/or Department Leads and Board

SUPPORTING DOCUMENTATION

At the time of writing, no supporting documentation was available.

RELATED POLICIES

Safeguarding Policy (GP 04)

SHEA Policy (GP 03)

Confidentiality and Privacy Policy (GP 02)

RELATED MATERIALS

SGSE Mission Statement.

SGSE Vision.

GP 05: APPENDIX 1

CODE OF CONDUCT AGREEMENT

Organization: SEEN for Gender & Sexual Equity

Parties: SEEN ("First Party") and _____ ("Second Party")

1. Purpose

This Code of Conduct establishes expected standards of behavior for all individuals representing SEEN.

2. Expected Conduct

- Treat all individuals with respect, dignity, and equity.
- Refrain from abuse, harassment, exploitation, or discrimination.
- Maintain safe professional boundaries with beneficiaries.



- Obtain written consent before photographing/recording.
- Report misconduct or safeguarding concerns immediately.

3. Prohibited Conduct

- Harassment or discrimination of any kind.
- Abuse of power, sexual exploitation, or coercion.
- Sharing confidential data without authorization.
- Substance abuse, violence, or unsafe behavior.

4. Accountability

Violations will be treated as misconduct and may result in termination or claims for damages.

Signed by:

- First Party (SEEN) _____ Date: _____
- Second Party _____ Date: _____

GP 05: APPENDIX 2

MISCONDUCT REPORTING FORM

Organization: SEEN for Gender & Sexual Equity

Reporter Information (optional)

- Name: _____
- Role: _____
- Contact Info: _____

Incident Details

- Date: _____
- Location: _____
- Individuals involved: _____

Type of Misconduct (check all that apply):

- ☐ Harassment ☐ Exploitation/Abuse ☐ Discrimination
☐ Breach of Confidentiality ☐ Misuse of Resources
☐ Other: _____

Description of Incident:

Action Taken So Far:

Reporter's Request:

- ☐ Confidential follow-up ☐ Record only ☐ Urgent action required

For Official Use Only



- Date Received: _____
- Case Number: _____
- Assigned To: _____
- Initial Action: _____

GP 05: APPENDIX 3

INFORMED CONSENT GUIDELINES

1. Purpose

The purpose of these guidelines is to ensure that all informed consent processes within SGSE projects are consistent, ethical, and respectful of participant rights. These guidelines provide direction for preparing, presenting, and obtaining informed consent in a clear and transparent manner.

2. Scope

These guidelines apply to all SGSE staff, consultants, interns, and volunteers who design or implement activities requiring the collection of personal data, testimonies, images, or participation in research, training, or documentation.

3. Definitions

Informed Consent

A voluntary agreement by an individual to participate in a project, activity, or research, given after receiving clear, accurate, and sufficient information.

Confidentiality

The obligation to protect personal information from unauthorized access, use, or disclosure.

Anonymity

A condition where identifying information is not collected or is removed, ensuring that individuals cannot be linked to the provided data.

4. Guiding Principles

4.1 **Clarity** – Consent forms must be written in simple, accessible language.

4.2 **Transparency** – Participants must understand what information will be collected, how it will be used, and who will have access.

4.3 **Voluntariness** – Consent must always be given freely, without coercion or undue influence.

4.4 **Right to Withdraw** – Participants must be informed that they may withdraw their consent at any time, without negative consequences.

4.5 **Confidentiality** – All reasonable measures must be taken to protect participant identity and data.

4.6 **Cultural Sensitivity** – Consent must respect cultural, social, and personal differences, including the use of preferred names and pronouns.



5. Procedure

5.1 Preparation

- Develop a consent form specific to the project, following the SGSE template.
- Clearly outline the project title, purpose, privacy measures, and options for consent.

5.2 Presentation

- Provide the consent form to participants before starting activities.
- Explain the form verbally if required, especially in cases of literacy or language barriers.
- Allow sufficient time for participants to review and ask questions.

5.3 Obtaining Consent

- Participants must sign or mark the form to indicate their agreement.
- Digital signatures or verbal consent (recorded with permission) may be used when written consent is not possible.
- A copy of the consent form must be offered to the participant.

5.4 Record Keeping

- Consent forms must be stored securely (locked files or encrypted digital systems).
- Access must be restricted to authorized personnel only.

5.5 Review and Withdrawal

- Participants may request to review or withdraw their consent at any time.
- Withdrawal requests must be documented and respected immediately.