SECTION 4
GENERAL CONDUCT, CODE OF ETHICS AND SAFETY

4.1  GENERAL ATTITUDE AND BEHAVIOR

4.1.1  Staff must maintain good and cordial relationships with their colleagues and customers at all times.

4.1.2  A high level of integrity and decorum is also expected of staff.

4.1.3  Staff should avoid any action or pronouncement that will tarnish the image of SFH.

4.1.4  Staff should show commitment at all times towards every goal and duty performed.

4.1.5  Relationships between staff that are detrimental to the aims and objectives of SFH are discouraged.

4.1.6  Staff should make effective use of their time and avoid activities that reduce effectiveness and efficiency, such as sleeping on duty, playing computer games, etc.

4.1.7  Actions that willfully obstruct or hinder other employees from executing or completing their assigned duties should be avoided.

4.1.8  Employees should operate in a manner that is both safe for themselves and their fellow workers and abide by all safety rules and regulations.

4.1.9  Employees leaving the office for any reason other than lunch should have the permission of their supervisor stating their destination, reasons and duration. The front desk officer may also be notified.

4.1.10  Staff shall attend to personal visitors briskly to avoid disruptions to their work.

4.1.11  Any change in an employee’s status or contact/residential address should be communicated
in writing to the Head of HR and the staff should also change his/her profile on the SAP Self Service Module. Employees who wish to change their marital status and name shall indicate in writing with a published newspaper notification attached.

4.2 ATTENDANCE
4.2.1. Punctual and regular attendance at work is required of all employees.

4.2.2. Absenteeism and lateness are unacceptable behaviour. They have an adverse effect on performance and may result in disciplinary action.

4.2.3. If for any reason, an employee would be late or absent, his/her supervisor must be notified in advance explaining the reasons and likely duration. Notification by proxies is not allowed except in emergencies.

4.2.4. Lateness or absenteeism without notification and approval is regarded as unexcused absence. Absenteeism for three consecutive days without notification may result in disciplinary action and/or termination.

4.2.5. An employee returning from an unexcused absence must report to his/her supervisor and disclose the reason for the absence. If the reason is not acceptable, the employee will be disciplined accordingly.

4.3 DRESSING AND APPEARANCE
4.3.1. The dress code for work at all times is professional (corporate or traditional). The standard of dressing for men and women is a suit, a dress shirt, jacket and trousers or a skirt, a dress or formal traditional attire.

4.3.2. Clothing that reveals too much cleavage, back, chest, thighs, stomach or underwear is not appropriate for a place of business. In our work environment, clothing should be pressed and never wrinkled. Torn, dirty, or frayed clothing is unacceptable. Any clothing that has words, terms, or pictures that may be offensive to other employees is unacceptable. Jeans (not tattered) are only to be worn on dress down Fridays.

4.3.3. Good personal hygiene and personal habits are also very important. Body cleanliness, especially of the hands and fingernails, is a must. Hair should be neatly groomed and worn in a style appropriate for a business environment. No employee will be permitted to wear un-natural hair colors or indecent body piercing in any visible part of the body while at work.

4.3.4. Female Staff
Female members of staff are expected to dress appropriately for an office environment. Attire such as shorts, exercise trousers, spandex trousers, tight fitting trousers, ripped jeans, miniskirts or skirt and gown below the knees, tank or mid-riff bearing tops, beach dresses, spaghetti-straps or any kind of sleeveless hands. If worn at all should be with Jacket. Any short hand sleeve must cover the Biceps or upper arm are all inappropriate for the office. Make up should be moderate and in good taste as appropriate for an office.

4.3.5. Male Staff
Male staffs are expected to wear a clean pair of trousers and shirt with tie or jacket or traditional attire with a cap and shoes. Shirts with offensive messages, controversial slogans, ripped jeans, jogging suits, midriff bearing tops, sweatshirts and armless tops are all inappropriate for the office.

4.3.6 Dress Down Days
Generally, Fridays are dress down days and casual or business casual dressing is allowed. Clothing that has the SFH logo is encouraged. However, if you have external engagements, you are advised to dress professionally or at least in a business casual style (such as jeans, a shirt and a jacket). You might want to keep a jacket in your office for the days when a partner unexpectedly appears on a dress down day. However, all standards of decency must be maintained.

4.3.7 Uniforms
4.3.7.1 Where uniforms are provided, employees shall wear them every day of the week and ensure that they are clean, well pressed and in good condition.

4.3.7.2 Uniforms shall be replaced as deemed fit by management or when necessary as a result of fair wear-and-tear. Any staff that loses his/her uniform may be surcharged. An employee who is issued an SFH uniform will be required to hand over the uniform in a clean and good condition to the HR division before final disengagement.

No dress code can cover all contingencies so employees must exert a certain amount of judgement in their choice of clothing to wear to work. If you are uncertain about acceptable, professional formal business or casual attire for work, please ask your supervisor or your human resources staff.

Any SFH staff who contravenes any provision on dress code shall be liable to disciplinary action.

4.4 SEXUAL HARASSMENT
4.4.1 Sexual harassment is defined as any repeated unwanted physical, verbal or visual sexual advances, requests for sexual favour, and other sexually oriented conduct which is offensive or objectionable to the recipient.

4.4.2 SFH’s position is that sexual harassment is a form of misconduct that undermines the integrity of the employment relationship. All employees have the right to work in an environment free from all forms of discrimination and conduct which can be considered harassing, coercive or disruptive, including sexual harassment.

4.4.3 SFH is committed to the maintenance of a safe working environment free of any form of sexual harassment. Any report of harassing conduct shall be investigated by an ad-hoc committee set up for this purpose and if confirmed, shall attract disciplinary action ranging from a warning to termination of appointment.

4.4.4 Any staff who feels he/she has been the recipient of sexually harassing behaviour, should report in writing immediately to his/her immediate supervisor and if the supervisor is the source of the harassing conduct, the staff should report to the supervisor of his/her
supervisor or Head of HR, who will within 24 hours investigate the allegation of sexual harassment. The Head of HR may investigate the matter further to confirm the allegation and report to management for appropriate action.

4.5 **TRAFFICKING IN PERSONS**

**Definition:** Trafficking in persons for the purpose of this policy shall mean the recruitment, transportation, transfer, harbouring or receipt, provision of persons, by means of threat or use of force or other forms of coercion, of abduction, of fraud, of deception, or the abuse of power or of a position of vulnerability or of the giving or receiving of payment or benefits to achieve the consent of a person having control over another, for the purpose of exploitation or for commercial sex activities. Exploitation shall include the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs;

- SFH regards trafficking of persons as described above, as an evil against humanity and punishable under the penal and criminal codes of Nigeria. SFH has a zero-tolerance policy regarding trafficking in persons.
- No SFH premises or property shall be used for the purpose of trafficking women and/or children by any person or persons within SFH and/or outside.
- SFH shall dismiss from its services any staff found to have committed acts that directly support or advance trafficking in persons, including destroying, concealing, confiscating or otherwise denying an employee access to the employee’s identity or immigration documents, failing to provide return transportation or pay for the return of an employee to the employees home-base outside Nigeria if this was a term of the employment contract, soliciting a person for employment by false or fraudulent representations.
- SFH staff are encouraged to report any activity they feel is in contravention with this anti-human trafficking regulations to the Director, HR or MD in confidence. Staff may also report to the Global Human Trafficking Hotline at 1-844-888-FREE or send an email to help@befree.org.

SFH prohibits retaliation against anyone who files a complaint or reports a suspected violation of this policy. An employee or other party who violates this policy will be subject to appropriate discipline by SFH, including, but not limited to, disclosure of the violation to government officials, when required by law or contract, and dismissal. SFH does not and will not permit its employees, fixed terms workers, consultants, casual workers, interns and volunteers, subcontractors, vendors, suppliers, or other entities doing business with SFH to engage in any form of human trafficking and the above activities.

4.6 **CHILD SAFEGUARDING POLICY**

4.6.1 **Purpose and Context**

This policy exists to protect children from abuse in the delivery of our programs, to affirm SFH’s commitment to the safety and protection of children and to ensure that in our work we do not perpetuate or reinforce systematic or structural abuse and discrimination of children. It provides definitions and outlines our guiding principles, roles, responsibilities and approach towards implementation which will ensure that this commitment is integrated into all areas of our work.
Scope
This policy applies to anyone who represents SFH; including but not limited to, staff, volunteers, contractors, donors, and Board Members, both during and outside normal working hours.

Definitions
For the purposes of this policy and SFH’s approach to child protection, the following definitions apply:

- Child: Any person under the age of eighteen (18) years as defined by the Convention on the Rights of the Child.
- Child protection: An activity or initiative designed to protect children from any form of harm, particularly arising from child abuse or neglect.
- Child rights: Children have the “right to life, survival and development” where development encompasses physical, emotional, cognitive, social and cultural development.
- Child abuse: Child abuse involves the abuse of children’s rights, and includes all forms of physical, emotional and sexual abuse, domestic violence, neglect, commercial sexual exploitation, child trafficking and child labour as defined below.
- Physical abuse: When a person purposefully injures, or threatens to injure, a child. Examples include, but are not limited to slapping, punching, shaking, kicking, burning, shoving or grabbing.
- Emotional abuse: A persistent attack on a child’s self-esteem resulting in injury to the child’s psychological capacity or emotional stability. Examples include, but are not limited to – name-calling, coercion, threatening, ridiculing, intimidating or isolating the child.
- Neglect: The persistent failure, where there are means, or the deliberate denial to provide a child with clean water, food, shelter, sanitation or supervision or care to the extent that the child’s health and development are placed at risk.
- Sexual abuse: When a child is used by another child, adolescent or adult, for his or her own sexual stimulation or gratification. Sexual abuse involves contact and non contact activities which encompasses all forms of sexual activity involving children, including exposing children to pornographic images, or taking pornographic photographs of children.
- The term “grooming” a child for sexual abuse relates to the act of building the trust of children and/or their carers to gain access to children in order to sexually abuse them. Grooming is also considered child abuse.
- Domestic violence: This includes verbal, physical, sexual or emotional violence within the household or family, which the child witnesses, usually on a regular basis.
- Commercial sexual exploitation: Where a child is sexually abused or exploited in return for cash or for kind.
- Child labour: Where the type and frequency of work that a child of a particular age is required to do exceeds Nigerian Labour Laws. Such work is considered harmful to the child and should therefore be eliminated.
- Military use of children: Where children are engaged in or exposed to military activity, including use as soldiers or human shields.

4.6.2 Policy Statement
SFH is highly committed to protecting children from exploitation and abuse. Children can be extremely vulnerable, especially in situations of poverty, humanitarian crisis or conflict,
and deserve higher standards of protection. As an organisation undertaking work in these contexts both nationally and internationally, SFH takes its duty of care seriously, particularly in protecting children. SFH agrees to abide by the following child safeguarding principles:

1. SFH will not tolerate any form of child abuse by anyone who is working within our programs or representing the organisation in any way. SFH will not permit representatives to work with children or access communities with whom we work if SFH is aware that they pose an unacceptable risk to children’s safety or wellbeing.

2. SFH will ensure compliance with Nigerian child protection laws and international standards.

3. SFH expressly prohibits all personnel from engaging in child abuse, exploitation or neglect.

4. SFH will apply measures to reduce the risks of child abuse, exploitation or neglect including limiting unsupervised interactions with children in official assignments, prohibiting exposure to pornography and complying with laws regarding image-generating activities for children.

5. SFH will promote child-safe screening procedures for personnel that are required to work directly with children within the ambit allowed by local laws and practices.

6. SFH shall flow down these child safeguarding principles to all contractors, partners and sub-awards engaged in USAID-funded activities.

4.6.3 Reporting Procedures:
SFH staff are encouraged to report any activity they feel is in contravention with this child safeguarding policy to the Safety Committee, the Director HR or MD in confidence.

Breaches of this policy and the Nigerian Child Protection Laws and international child protection protocols will not be tolerated and may result in disciplinary procedures, change of duties, termination of employment or dismissal.

4.7 DRUG FREE WORKPLACE POLICY
SFH is committed to protecting the safety, health, and wellbeing of its employees. SFH standards of conduct prohibits the possession, use or manufacture of illegal substances, narcotics, alcohol or drugs on the premises or while at work.

4.7.1 The use of legal prescription drugs in excess or without a prescription or abuse of alcohol or over-the-counter drugs to the extent that health or safety is in jeopardy is a violation of this policy.

4.7.2 Employees who violate this policy will be subject to disciplinary action up to and including termination.

4.7.3 Any employee arrested or convicted in relation to a drug related charge must notify the Head of HR within 1 week indicating which law has been violated. SFH reserves the right to sanction treatment for convicted persons who wish to continue their employment after a conviction.

4.7.4 It is a term and condition of employment that all SFH employees agree that SFH may randomly screen employees at management’s discretion and will also test staff who may appear to demonstrate signs of drug use, intoxication or other screening required to
operate motor vehicles.

4.7.5 SFH will search staff property on its premises in accordance with our security policy where there is good reason to believe illegal drugs are present.

4.7.6 An employee who refuses to be tested under this policy maybe subject to disciplinary action up to and including termination. The employee shall be given an opportunity to explain the circumstances prior to any final action.

4.7.7 Smoking in prohibited areas within SFH premises and during working hours is also grounds for disciplinary action, including termination of appointment.

4.8 MALICIOUS GOSSIP/RUMOUR MONGERING
Engaging in the spread of malicious gossip, rumour mongering and/or similar acts or distributing caricatures that are aimed at ridiculing or disparaging an individual or group of staff members or whipping up sentiments against management is not permitted. Such acts are grounds for disciplinary action, including termination of appointment.

4.9 PRIVATE MISCONDUCT
Although SFH would not like to interfere with the private life of its staff, it would however, not be indifferent to the conduct of its staff in respect of their private financial and non-financial matters, especially where this affects the image, output and efficiency of the individual, other staff or SFH operations.
SFH shall take disciplinary action(s), including termination of appointment of an SFH staff who conducts his/her private affairs in a manner that negatively affects SFH’s image, the output and effectiveness of the individual, other staff or SFH generally.

4.10 ACTS OF MISCONDUCTS
Acts of misconducts include but are not limited to the following:

☐ Theft or fraud
☐ Falsification of company or personal records
☐ Failure to follow safety practices
☐ Assault or otherwise threaten or intimidate fellow staff, customers or others
☐ Willful or negligent destruction of company property
☐ Use and/or possession of intoxicants, or narcotics
☐ Neglect and/or abandonment of duty
☐ Insubordination
☐ Gambling or engaging in pools staking
☐ Maligning or defamation of the character of other staff
☐ Engaging in gossip or idle time chatter
☐ Engaging in abusive use of the internet, including visits to pornographic sites
☐ Disorderly or indecent behaviour
☐ Sexual harassment
☐ Gender and other forms of religious discrimination
☐ Rudeness to superiors
☐ Buying and selling during official hours
☐ Indecent dressing
☐ Fighting on duty
☐ Absenteeism
☐ Lateness to work
☐ Job abandonment
☐ Discrimination of other staff living with HIV/AIDS
☐ Women and child trafficking

4.11 ARREST AND CONVICTION FOR A CRIMINAL OFFENCE
4.11.1 A member of staff that is arrested and detained should inform the HR Division as soon as possible so that he/she will not be considered as having abandoned work.

4.11.2 If the arrest and detention is as a result of carrying out official functions, the organisation shall arrange legal representation and defense so long as the staff has not committed any unlawful act.

4.11.3 If the arrest and detention is as a result of his/her private actions, the staff shall be responsible for sorting out the situation. If the staff has any outstanding days of annual leave, any days of absence taken in pursuit of defending the matter shall be deducted from his/her annual leave.

4.11.4 If the person is detained for a criminal matter for a period in excess of any available leave days, management may suspend the person (with or without pay) or terminate the employment as the situation demands.

4.11.5 If a staff is convicted of a criminal offence while still an employee of SFH, the staff shall be dismissed.

4.12 CONFIDENTIAL INFORMATION
☐ All SFH information is for internal purposes only and is considered confidential and proprietary and must be treated as such.

☐ Information about the organisation's private and public sector partners, donors and customers must also be treated as confidential.

☐ When in doubt as to the confidentiality or otherwise of information, staff should seek the advice of their supervisor or the Managing Director.

☐ A breach of confidentiality may result in termination of appointment.

☐ It is an offence for any disengaging staff to copy, print or take out any official SFH document or e-mail. Doing this makes the disengaging staff liable to prosecution.

☐ SFH Confidential or Proprietary Information includes, without limitation, any information regarding SFH’s employees, operations, products, services, strategies, research, policies, systems, budgets, proposals, finances, programs, plans, donor or business relationships, or any other information not generally known to the public that is learned by the Employee as a consequence of employment by SFH.
4.12.1 **Use of Work Product.**
Any work produced or developed in the course of the employee’s work at SFH is the exclusive property of SFH. The employee waives any rights, including intellectual property rights, in such work product, and is prohibited from reproducing, distributing, or making any other use of such work product outside SFH without SFH’s express authorisation.

4.13 **UNAUTHORISED TESTIMONIALS AND MISREPRESENTATIONS**
- No member of staff should represent the interest of SFH in any gathering or activity or commit SFH to a financial obligation unless authorised. Impersonation and misrepresentation will lead to termination of appointment.
- Only the Head of HR, a DMD/C-Suite officer or the MD are permitted to give any testimonial or reference or recommendation on behalf of SFH regarding any former staff member.

4.14 **CONFLICT OF INTEREST AND CONSULTANCY**
SFH as an organization with considerable knowledge and expertise in the NGO world from time to time receive requests formally from organisations asking that her employees come to carry out intervention activities in areas wherein the requesting organization have minimal competencies. Society for Family Health employees also get individual informal requests asking that their skills and competencies be applied for the good of a requesting body or organization.

As we oblige such organisations their request for which by extension we get to motivate and build the capacity of our employees, we will not also want to shortchange our organization in terms of paid management time and the risk of exposing our trade secrets to competitors. To address these concerns, the following shall apply:

1. Employees will be free to carry out consultancy services for organisations requesting such services so long as the employee declares formally to SFH that such services have been requested and the fees charged.
2. SFH employees will not use payable management time to attend to external consultancy services. In the event that this happens, the employee will not complete that portion of the timesheet in his/ her monthly timesheet. The employee will earn 60% of the fees paid and remit 40% to SFH.
3. When SFH seconds an employee to act as a consultant in a requesting organization, SFH will in addition to the earned salary pay the employee a token of 2.5% to 5% of the profit component as a token for service rendered to the employee.
4. In the event that there is more than one employee engaged for the consultancy, a reasonable percentage of the earned profit will be determined and shared in a proportion equitable to the contribution of the consultants in the said project.

Under no circumstance will any employee engage in any consultancy service wherein there is a high likely hood of divulging SFH trade secrets in order to successfully deliver on the project. Any employee who engages in such will have his or her appointment severed.
4.15 **RELATIONSHIP WITH CUSTOMERS/CLIENTS**

- Relationships with customers and clients must be cordial and professional at all times. Service should be customer-oriented at all times. Staff shall not demand for or accept gifts from SFH customers or clients.

- Recommendations and letters on SFH letter headed paper shall be signed by a staff at the minimum of grade 004 or his/her designate/equivalent. When signed by a Director’s designate, a copy of such letter shall be forwarded to the Director. Copies of all recommendations on SFH letter headed paper must be sent to the appropriate higher level officer for filing.

- It shall be a misuse of SFH property which will attract appropriate disciplinary actions for any recommendation/letter on SFH letter headed paper that does not follow the procedure indicated in this section.

4.16 **SFH EQUALITY AND DIVERSITY POLICY**

SFH appreciates the diversity of the Nigerian environment and will strive to ensure fairness and equality in all its dealings. In this regard SFH will:

- Treat all people with dignity and respect, valuing the diversity of all.

- Will promote equality of opportunity and diversity.

- Ensure people are able to work in a healthy and safe environment free from hazard.

- Ensure everyone has access to opportunities for training and development to develop to their full potential.

- Will support in helping employees balance work and home life commitments within reasonable limits.

- Will eliminate all forms of discrimination on grounds of gender, marital status, disability, ethnic leaning, age, social class, sexual orientation, religion/belief, or any other factor considered irrelevant in achieving the purpose of this policy.

4.17 **SFH DISABILITY POLICY**

- SFH as a caring and equal opportunity employer recognises that the majority of disabled people are as effective as able bodied people and so will not discriminate against engaging disabled persons into its workforce. In addition, SFH will help disabled persons in settling into work to enable them develop their employment potential within the shortest time. SFH will apply the policy as follows:

- Within the constraint of legitimate job requirements, treat applications from disabled persons the same way as from persons without disability.

- Ensure the special needs of disabled applicants are accommodated during the interview process.
☐ Will not discriminate against a disabled person in relation to the processes that will be followed in determining to whom the job will be offered.

☐ Will within reasonable limits try to make adjustments to work and the work environment to overcome practical barriers to a disabled person. Reasonable adjustment will include balancing the cost of the adjustment and the disruption it would cause against the benefits of making it, the resources of the organisation and the availability of any financial assistance.

☐ Will allow the individual to be absent for any treatment or rehabilitation activity.

☐ Will allow flexibility of work hours to accommodate the situational needs of the employee.

4.18 SFH GENDER POLICY
The achievement of the overall goal will be based on two broad levels:
1. Programmatic
2. Organisational

4.18.1 Programmatically the gender policy makes corporate policy statements on the following:

4.18.1.1 Project and programme documents
   All project and programme documents will ensure gender balance in representation, content and application; and modalities for implementation briefs and marketing plans: Gender will be mainstreamed in all campaigns, advocacy and media messages.

4.18.1.2 Research and evaluation methods:
   SFH will ensure that research methodologies and reports are disaggregated by gender, taking into cognisance peculiarities of the male and female gender.

4.18.2 Organisationally the corporate gender policy is as follows:

4.18.2.1 Recruitment plan - Gender equality will be a consideration during recruitment and in staff retention and promotion. However, females maybe further encouraged, to balance the disparities created by past inequities; and to adhere to global prescriptions that Where there is disparity, a deliberate tradeoff is made to bring about gender equality - (UNDP/UNIFEM document). It will equally be extended to encourage gender balance in interview panel composition, disciplinary committee and all committee compositions.

4.18.2.2 Gender Capacity Building Issues - Although training is based on identified needs, efforts should be made to ensure gender balance in staff selection for participation in training courses both locally and internationally.

4.18.2.3 SFH Crèche - Where possible, SFH will continue to provide crèche facilities for children of members of staff.
4.18.2.4 **Maternity Leave** - SFH will continue to provide competitive maternity benefits to attract female staff in line with SFH personnel policy.

4.18.2.5 **Paternity Leave and Related Policy** - SFH will continue to provide competitive paternity benefits to attract male staff in line with SFH personnel policy.

4.18.2.6 **Workplace Policy** - Policies on HIV, sexual harassment, dress code for staff, etc shall be addressed with utmost gender sensitivity.

4.18.2.7 **Customer Relations** - All contractors, staff, temporary staff who interact with our public should be trained on gender sensitivity.

4.18.2.8 **Staff Relations** - SFH policy and practices will encourage staff to ensure equal treatment and respect for male and female persons, which is devoid of fear-inducing threats or blackmail. This applies to staff and non-staff.

4.18.2.9 **Gender Focal Persons** - For more programmatic and organisational attention to be paid to gender mainstreaming, divisional or programmatic gender focal persons will be appointed.

4.18.2.10 **Gender Working Committee** - A gender committee shall exist to deliberate on gender matters and gender mainstreaming; and recommend solutions to management. All gender committee members’ capacity will be constantly updated.

4.18.2.11 **Orientation for New Staff** - Orientation programme for new staff will have a gender sensitisation component and there will be continuous training and refresher updates on current gender mainstreaming issues.

4.18.2.12 **Work Environment** - SFH will provide a gender sensitive work environment by taking due consideration of the peculiar needs of women and men.

4.18.2.13 **Financial Commitment** - SFH will make adequate provision and financial commitment to implement gender related programmes and polices targeted at gender equality.

4.18.3 **Implementation and Accountability**

- The Executive Management will be accountable for the full implementation of the policy.

- Apart from general circulation of the policy, the policy will be fully operationalised through seminars, workshops, newsletters and round table discussions.

- All staff are expected to reflect the organisation’s commitment to gender mainstreaming in their work and the conduct of SFH affairs.

- The gender working committee will support the development of indicators for progress in gender issues and monitor and report on same.

- Gender main-streaming activities are subject to availability of funds.

4.19 **HIV/AIDS WORKPLACE POLICY**

SFH defines the rights and responsibilities of the employer and the employee for guidance.
These rights and responsibilities are subject to availability of funds and will be reviewed from time to time for the benefit of employees and their immediate families (as defined in the SFH Personnel Policy), the employer and SFH at large.

4.19.1 Rights and Responsibilities of the Employer.
1. To provide access to accurate and appropriate information on STIs, HIV and AIDS to all employers in a language that is understood by all.

2. To provide access to free condoms where available.

3. To provide access to quality, voluntary counselling, testing and treatment for STIs, HIV and AIDS for employees and their immediate family (as defined in the SFH Personnel Policy and properly registered by the employee with SFH).

4. To avoid any kind of discrimination against employees who are HIV+, whether male or female, all employees will be judged solely on their qualifications and ability to perform the requirements of the job.

5. All employees, including those who are HIV+, will be treated as full and respected members of staff. HIV status will not be taken into consideration when assessing suitability for promotion, which will be decided on merit alone, unless the employee’s health status affects his/her ability to take on increased responsibilities.

6. HIV status will not, other than in the most exceptional circumstances, be shared with others without the employee’s prior written consent and in the case of spousal disclosure, gender rights will be respected.

7. To make every reasonable effort to accommodate special needs of HIV+ employees, within the limits of what is reasonable and practical in any given situation.

8. To make every reasonable effort to offer continuing employment to those who are HIV+, as long as they remain able to work safely and to acceptable standards.

9. To pursue a policy of enhanced HIV/AIDS awareness, involving staff and immediate family, both to help prevent the spread of the disease, and to promote better understanding of its causes and consequences.

10. All staffs are expected to support the principles of the workplace policy. Acts of discrimination against or harassment of an HIV+ employee, whether male or female, on the grounds of his or her infection, will be considered a disciplinary offence.

4.19.2 Rights and Responsibilities of the Employee.
1. To have access to accurate information on STIs, HIV and AIDS.

2. To have access to confidential counseling.

3. To have access to quality condoms where applicable.

4. To have access to free HIV testing and treatment for the employee and their immediate family (as defined in the SFH Personnel Policy and registered by the employee with SFH).
5. To be treated as full and respected members of staff. HIV status will not be taken into consideration when assessing suitability for promotion, which will be decided on merit alone.

6. To have human rights respected whether or not an employee is HIV-Positive.

7. To continue to work as long as the employee can perform the work and is not putting others at risk through the spread of infectious diseases acquired as a result of HIV (e.g. tuberculosis).

4.19.3 Responsibilities

1. To use the information, advice, counseling and referral services appropriately.

2. To look after personal health and to practice safe sex. To seek help if personal health is likely to put others at risk (e.g. if suffering from tuberculosis).

3. Not to indulge in willful transmission of the Virus.

4. To respect others, regardless of their HIV status.

5. To provide accurate information confirming a spouse who is being declared eligible for treatment. Signing a false declaration is a disciplinary offence.

6. To alert SFH of any problems through the confidential reporting feedback mechanism of SFH.

7. Compliance with medical advice given.

4.20 FRAUD POLICY

SFH management is responsible for the detection and prevention of fraud, misappropriations, and other inappropriate conduct. Fraud is defined as the intentional, false representation or concealment of a material fact for the purpose of inducing another to act upon it to his or her injury. Each member of the management team will be familiar with the types of improprieties that might occur within his or her area of responsibility, and be alert for any indication of irregularity.

Any fraud that is detected or suspected must be reported immediately to the Managing Director as well as the Head of the Internal Audit Department, who will coordinate all investigations both internal and external.

The Managing Director and/or Head of the Internal Audit Department must in turn report to the Chairman of the Board Audit and Finance Committee (BAFC).

In addition, the Managing Director or designate shall report any fraud case that involves an amount above USD500 to the appropriate donor agency.

4.20.1 Actions Constituting Fraud

The terms defalcation, misappropriation, and other fiscal wrongdoings refer to, but are not limited to:

☐ Any dishonest or fraudulent act
Forgery or alteration of any document or account belonging to SFH
Forgery or alteration of a cheque, bank draft, or any other financial document
Misappropriation of funds, supplies, or other assets
Impropriety in the handling or reporting of money or financial transactions
Profiteering as a result of insider knowledge of company activities
Disclosing confidential and proprietary information to outside parties
Accepting or seeking anything of material value from contractors’ vendors or persons providing services/materials to the Company.
Destruction, removal or inappropriate use of records, furniture, fixtures, and equipment; and/or
Any similar or related inappropriate conduct related to financial gain.

4.20.2 Other Inappropriate Conduct
Suspected improprieties concerning an employee’s moral, ethical, or behavioural conduct, should by resolved by the most appropriate staff between the Director Human Resources and Managing Director or designate.
If there is any question as to whether an action constitutes fraud, contact the Head of Internal Audit for initial guidance.

4.20.3 Investigation Responsibilities
The Head of the Internal Audit Department has primary responsibility for the investigation of all suspected fraudulent acts as defined in the policy. If the investigation substantiates that fraudulent activities have occurred, then the Head of the Internal Audit Department will issue reports to the Chairman of the (BAFC).
Any investigative activity required will be conducted without regard to the suspected wrongdoer’s length of service, position/title, or relationship to SFH.
Decisions to prosecute or refer the investigation findings to the appropriate law enforcement and/or regulatory agencies for independent investigation will be made by the Board in conjunction with the Managing Director, legal adviser and senior management, as will final decisions on disposition of the case.
This policy applies to any fraud, or suspected fraud, involving employees as well as other stakeholders and partners, consultants, vendors, contractors, outside agencies doing business with employees of such agencies, and/or any other parties with a business relationship with SFH.
These provision should be read alongside the SFH fraud reporting guidelines. Staff can get copies of the guidelines from the Internal Audit Division.

4.21 WHISTLE BLOWING POLICY
Whistle blowing is the release of information by a member or former member of, or persons associated with, an organisation that is evidence of illegal or immoral conduct in the organisation, or conduct that is not in the public interest. SFH is committed to the highest standards of openness, probity and accountability.
It is important to us that any fraud, misconduct or wrongdoing by workers or officers of the organisation is reported and properly dealt with. The organisation therefore encourages all individuals to raise any concerns that they may have about the conduct of others in the organisation or the way in which the organisation is run. This policy sets out the way in
which individuals may raise any concerns that they have and how those concerns will be dealt with.

4.21.1 Principles
4.21.1.1 This whistle blowing policy is intended to provide protection for you if you raise concerns regarding wrongdoing in SFH, such as concerns regarding incorrect financial reporting, unlawful activity or activities that are not in line with SFH policy, including SFH code of ethics or guiding principles, which otherwise amount to serious misconduct.

4.21.1.2 Workers should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.

4.21.1.3 Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the worker who raised the issue.

4.21.1.4 No worker will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the worker will not be prejudiced because he/she has raised a legitimate concern.

4.21.1.5 Employees have the right to make appropriate external disclosure through the SpeakUp Ethics Hotline by reporting the matter to the independent service provider without going through the internal procedure first. The organisation, however, would encourage the employee to raise the matter with their manager, designated person, Head of Division, Director, DMD or the MD prior to doing so, unless there are genuine and well-founded grounds for not doing so.

4.21.1.6 If misconduct is discovered as a result of any investigation under this procedure, disciplinary procedure will be used, in addition to any appropriate external measures.

4.21.1.7 An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager or head of division, staff should not agree to remain silent. You should report the matter to a Director or person senior to the person asking you not to report the wrongdoing.

4.21.2 Procedure
This procedure is for disclosures about matters other than a perceived actual or potential breach of an employee’s own contract of employment. In cases of breaches of contract of employment, you should use the grievance procedure.

4.21.3 Reporting Channel
1. Internal Reporting: Inform your line manager, the Director HR; Head of Internal Audit or the Managing Director.
2. External Reporting: If you do not feel comfortable to inform one of the key members above, or you have exhausted all internal reporting channels, please make use of the
4.21.4 Investigation Process
All matters will be investigated by following the forensics investigations manual, including the forensics notice protocol.
☐ All matters reported will be investigated.
☐ Investigations will be conducted by an independent internal team/external party. The investigation may involve obtaining written statements.
☐ Where appropriate, the matter will be escalated to the appropriate government department, donor or regulatory agency.
The organisation will provide the independent service provider of the whistleblowing hotline with a monthly status update on all matters reported. If the whistle-blower is known to the organisation or the service provider, the person will be contacted and given feedback. If the whistle-blower is anonymous, the person would need to contact the service provider to request feedback.

4.21.5 Safeguards
4.21.5.1 Harassment or Victimisation – Harassment or victimisation for reporting concerns under this policy will not be tolerated. Victimisation of a worker for making a disclosure will be a disciplinary offence.

4.21.5.2 Confidentiality – Every effort will be made to treat the complainant’s identity with appropriate regard for confidentiality.

4.21.5.3 Anonymous Allegations – This policy encourages employees to put their names to the allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will be explored appropriately, but consideration will be given to:
☐ The seriousness of the issue raised
☐ The credibility of the concern; and
☐ The likelihood of confirming the allegation from other attributable sources.

4.21.6 False Reporting- There may be instances where a disclosure is made, based on genuine belief by the worker that something is wrong at a particular time, which is subsequently demonstrated to be false or inaccurate. In such circumstances, if the worker is not anonymous, the organisation will inform the worker of the discrepancy between their report and the facts at hand. Provided the organisation is satisfied that the worker acted in good faith and had a genuine belief that such a situation should be reported, no further action will be taken.
If it becomes apparent to the Manager or Director HR that the worker making the disclosure has acted maliciously or frivolously, or has acted for personal gain, this will be dealt with through the organisation’s disciplinary process. Action taken may include summary dismissal for gross misconduct.

4.22 USE OF SFH PROPERTY
Due care and responsibility should be taken in the handling of all SFH assets, facilities and properties. Damages due to negligence will attract disciplinary action and/or payment.
for the cost of damages and/or termination.

Identity Cards: Identity cards are issued to members of staff and they are required to carry them at all times. The identity card remains the property of SFH and will be surrendered to SFH upon leaving service. A staff that loses his ID card shall be required to obtain a police report for submission to the head of Human Resources before replacement is made. The staff shall bear the cost of replacement.

4.22.1 SFH Letter Headed Papers

No staff is allowed to use SFH’s letterhead or other documents for unofficial purposes. Official letters on SFH letterhead addressed to outsiders shall only be signed by Divisional Heads and above. Field team leaders are however permitted to sign official letters on behalf of SFH, but only when the Divisional Head has been adequately briefed on the contents of the letter. A copy of the letter must also be forwarded to the Divisional Head.

4.22.2 Vehicles: All staff shall read and familiarize themselves with the Vehicle Movements and Maintenance Policy for guidelines on the use of project Vehicles.

4.22.3 Telephone: Members of staff are expected to use their good judgement when making calls.

☐ The use of SFH telephones for personal local calls should be kept to the barest minimum and must not interfere with the employee’s work or office operations.

☐ Junior staff must obtain permission from the Head of HR before making any call.

☐ Personal international calls are not allowed on SFH phones.

☐ For all official international calls, management staff are required to obtain permission from the Managing Director/Deputy or Head of HR Admin.

☐ All official international calls must be logged/recorded by the front desk officer.

☐ SFH reserves the right to charge staff for unapproved personal phone calls.

4.22.4 Office Equipment:

All office equipment including photocopiers, computers, printers, etc. are to be used for official project work only. Management reserves the right to charge staff for use of office equipment for unapproved personal use. Misuse of any SFH property will attract disciplinary action

4.22.5 Mobile Asset Guidelines:

Mobile assets are equipment which are not assigned to any fixed location but assigned to a staff to ensure that work is done effectively and efficiently. The assignee is allowed to move around with the asset without completing any asset transfer form. Assets classified as mobile assets include but are not limited to iPad, computer laptop, projector, camera, camcorder, telephone handsets and related assets.

4.22.5.1 Mobile Asset Form: Any staff holding a mobile asset must complete a mobile asset form and submit to the Head of Admin Division. It is mandatory to complete the mobile asset form and any SFH asset found in the possession of a staff without duly completed
asset form on record constitutes gross misconduct and may attract disciplinary action from SFH management.

4.22.5.2 **Safety and Security of Mobile Assets**: Staff holding a mobile asset must safeguard such asset against theft, misuse/abuse and damages. Staff must report lost, stolen and damaged mobile assets in accordance with fixed asset management policy and guidelines.

4.22.5.3 **Lost, Stolen and Damaged Ipad**: SFH shall not be responsible for the replacement of lost, stolen and damaged iPads. A staff who loses or damages an SFH iPad shall replace it with a minimum, the exact specification (where not available, a newer model) as the lost or damaged iPad. The staff shall submit the replacement asset to IT through the Head of Administration for specification check and update of asset register and mobile asset form.

4.23 **ILLEGAL ASSEMBLY AND POLITICKING**
Members of staff are not allowed to partake in any form of political activity such as campaigns, rallies and meetings while at work within the premises of SFH or as a representative of SFH.

Unauthorized meetings and other forms of gathering, which are capable of causing dissention, or disaffection between management and other staff members, or between staff members, department and zones, are not permitted either on SFH premises or elsewhere and are grounds for disciplinary action, including termination of appointment.

4.24 **SFH AUTHORISATION MATRIX**
The SFH matrix provides guidance for approvals of certain actions within SFH. When performing any actions on behalf of the organization, it is required that all staff adhere to this authorization policy to ensure that

- Transactions are properly reviewed, checked for policy compliance, recorded and reported
- Transactions are properly authorized
- Resources and assets are safeguarded against unauthorized or improper use.

Staff may obtain the current Authorization Matrix from HR.