

## SPARK Partner Code of Conduct

(version aug 2020)

### Purpose

This Code of Conduct provides the ethical framework in which SPARK operates. It provides an overview of the values, commitments, responsibilities and integrity that we stand for. When operating within the framework of this Code of Conduct, we create a responsible and transparent environment in conducting our business and in our organisation internally.

This Partner Code of Conduct applies to all our Partner Organisations, Service Provider and Consultants (after this in short: 'partners'); it governs every decision we make. The Partner Code of Conduct is signed by all partners as part of their contract and with that the SPARK partner declared that he/she/it will behave accordingly.

This Partner Code of Conduct has been aligned with The Integrity System Guide produced by Governance & Integrity International.<sup>1</sup>

In addition to this Code of Conduct, there is a Staff Code of Conduct, which applies to all SPARK employees (including BoD), interns, volunteers and longer-term consultants acting on behalf of SPARK.

### Our Values

In SPARK, we work according to the following values, which are key in all our engagement with beneficiaries, partners, donors and each other and we expect our partners to adhere to as well.

**TRUST** is our belief to be reliable, fair and have **integrity**

**CAN DO** attitude is how we achieve our best **results**

**CARE** for what **we do** and who we work with

**COURAGEOUS** in who we are, what we do, and who we **support**

**IGNITE** innovative responses to the ever **changing needs** of the countries we work in

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<sup>1</sup> The Integrity System Guide provides extensive guidelines for development organisations and charities to develop and maintain a comprehensive integrity system including a Code of Conduct. The Guide can be found here:

[https://www.partos.nl/fileadmin/files/Images/Integriteit/24905\\_GDN\\_PARTOS\\_HANDREIKING\\_UK\\_DEF.pdf](https://www.partos.nl/fileadmin/files/Images/Integriteit/24905_GDN_PARTOS_HANDREIKING_UK_DEF.pdf)

## **Transparency**

SPARK highly values transparency throughout the entire organisation, in its programmes and towards beneficiaries as well as in its collaboration with Partner Organisations, Service Providers and Consultants. SPARK does not pretend to act flawlessly, nor does SPARK expect this from its partners. However, in all circumstances SPARK expects partners, as well as SPARK staff, to be as honest and transparent as possible about results, mistakes and incidents. Most of all, SPARK expects staff and partners to behave with integrity.

## **Unacceptable behaviour**

The following behaviour is unacceptable when working with SPARK:

### *Misuse of Power or Position*

- Corruption
- Grant any contracts, assignments and benefits related to SPARK projects to relatives and friends
- Intentionally provide external parties with incorrect or incomplete information

### *Financial Violations*

- Theft and Fraud
- Misuse or improper use of resources
- Tax evasion or asset management/investment policy contrary to the organisation's purpose and objectives

### *(Inter)personal Violations*

- Engage in any behaviour that affects the dignity of women, men and children which is considered as unwanted, unacceptable, inappropriate and offensive to the recipient and/or create an intimidating, hostile, degrading, humiliating or offensive environment for them (includes unwanted intimacy, sexually aggressive behaviour and bullying)
- Use of narcotics
- Discrimination based on race, gender, sexual orientation, disability, political convictions, religion, or for any other reason, in any way.

## **Data Confidentiality**

Our partners need to make responsible use of the information to which they have access and do not divulge any confidential information about beneficiaries and persons of concern to SPARK. Both while working for and after leaving the partner organisation, any confidential information our partners have obtained will not be disclosed to others.

## **Prevention & monitoring**

In SPARK relevant integrity risks are assessed and reviewed on at least an annual basis as part of a larger risk assessment. SPARK encourages partners to promote desirable and repress unacceptable behaviour in their organisations, as well as to increase awareness and to communicate the content of this Code to their staff and volunteers. If not yet present, partners are encouraged to introduce a Code of Conduct for their own staff as well as their own measures and procedures on this matter. SPARK is ready to share its own procedures and code for staff.

## **Reporting of violations**

SPARK encourages partners to report any alleged violations in their organisations directly to SPARK senior staff. Beneficiaries participating in services and activities provided by them can report violations by contacting senior project staff. In case this would be inappropriate or is to no avail, the External Confidential Advisor and/or the SPARK Director of Operations can be contacted through the Whistle-blowers' policy.<sup>2</sup> At a general level SPARK reports on numbers and types of incidents that occurred in its Annual Report.

## **Investigation and sanctions**

In case of an alleged violation SPARK will conduct an investigation or make use of an independent external investigator or auditor. The investigation shall respect the rights of all parties involved. An investigation report will address the incident itself as well as on any preventive and corrective measures already taken by the Partner and include recommendations for SPARK. SPARK may request to suspend all activities and services during the investigation. Should the investigation confirm that a violation has occurred appropriate disciplinary action or a sanction will be imposed. Sanctions may vary from decreasing or completely stopping funding; reclaiming of the entire or reasonable share of funding provided; terminating the cooperation and or a decision to ban future partnerships. In case of a criminal offence competent authorities will be informed.

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<sup>2</sup> Contact details and further explanation can be found in SPARK's Whistle blower Procedure available on the Documents page of the SPARK website: [https://spark.ngo/wp-content/uploads/2020/01/SPARK\\_Whistle-blower-Procedure\\_V4.pdf](https://spark.ngo/wp-content/uploads/2020/01/SPARK_Whistle-blower-Procedure_V4.pdf)

### **Violations by SPARK (staff)**

SPARK staff sign a Code of Conduct committing to comply with SPARK values and standards. This Code of Conduct also includes all of the above listed violations. Reporting violations of SPARK staff can be done by contacting the SPARK HR department. In case this would be inappropriate or is to no avail, the External Confidential Advisor and/or the SPARK Director of Operations can be contacted.<sup>3</sup>

**When signing the contract with SPARK, which refers to this Code of Conduct, the Partner Organisation / Service Provider / Consultant declares that they:**

- **Will comply with this Code of Conduct**
- **Attest that no active official legal investigation is currently pending against the organisation/him/her.**
- **Ensure that the organisation has indicated any past affiliation with political parties or groups that could affect the work with SPARK.**

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