Probatio Africa

Code of Conduct

What we expect of everyone who works for us or with us, and what happens if those standards are broken.

Version	1.0
Approved	10 October 2026
Approved by	James Lumowo, Managing Director
Next review	October 2027
Applies to	Everyone who works for or on behalf of Probatio Africa

In short

- Collect and report data honestly: never fabricate, falsify or alter an interview or a finding.
- Treat every participant with respect, and never exploit the power that comes with a clipboard or an ID card.
- Protect personal data as if it were your own, and report a breach within 24 hours.
- Declare conflicts of interest, refuse bribes, and speak up when something is wrong.

1. Purpose

Our clients rely on our evidence, and our participants trust us with their time, homes and personal information. This Code sets out the behaviour that keeps both kinds of trust. It turns our values into specific standards, and it applies alongside our Safeguarding and Referral Policy, Privacy Notice and Standards and Ethics commitments.

2. Who this Code applies to

This Code applies to everyone who works for or on behalf of Probatio Africa: directors, employees, consultants, field supervisors, enumerators, research assistants, interns, volunteers, drivers, recruiters, local guides, interpreters, and subcontracted firms and their staff. It applies during working hours and outside them whenever a person represents Probatio Africa or could reasonably be seen to do so, including online.

3. Our values

- Integrity: we tell the truth about what we did, what we found and what we do not know.
- Independence: we report findings whichever way they point.

- Respect: we treat everyone with dignity, whatever their status.
- Rigour: we follow the agreed method and check our own work.
- Accountability: we own our mistakes and correct them in the open.

4. Research integrity

- Never fabricate, falsify or alter data. Completing any part of an interview that did not take place, or changing an answer, is gross misconduct.
- Follow the approved protocol, sampling plan and instruments. Report any deviation to your supervisor the same day, and record it.
- Cooperate fully with back-checks, spot-checks and audits, and never discourage a participant from answering a back-check.
- Keep accurate, complete and timely records of fieldwork, consent and quality checks.
- Credit others' work properly, and never present someone else's work or data as your own.
- Never adjust an analysis, a finding or a report to suit a client's or funder's preference. Raise any pressure to do so with the Managing Director.

5. Respect for participants and communities

- Introduce yourself truthfully, show your identity card, and explain the study, its purpose and how long it will take.
- Seek consent before every interview, recording or photograph, and respect a refusal or a decision to stop without argument.
- Never promise benefits, payments or services the study cannot deliver.
- Respect local customs, community leaders and the permissions they give, while remembering that each person still decides for themselves whether to take part.
- Dress and behave appropriately for the setting. Never work under the influence of alcohol or drugs.
- Never discriminate on the basis of sex, age, disability, ethnicity, religion, language, political opinion or status.

6. Safeguarding and protection from sexual exploitation, abuse and harassment

Everyone must read, sign and follow the Safeguarding and Referral Policy. In particular:

- Sexual exploitation, abuse and harassment are forbidden, and are gross misconduct.
- Sexual activity with anyone under 18 is forbidden, whatever the local age of consent.
- Exchanging money, work, goods, services or research participation for sex or sexual favours is forbidden.
- Sexual relationships with participants or members of their households are forbidden for the duration of a study.
- Every concern must be reported within 24 hours.

7. Confidentiality and data protection

- Handle personal data only as the study requires, and in line with the Nigeria Data Protection Act 2023 and our privacy notice.
- Use only approved, password-protected and encrypted devices and accounts for research data. Never store or send participant data through personal email, personal cloud storage or messaging groups.
- Never discuss a participant's answers or identity with anyone outside the study team.
- Report any loss, theft or suspected breach of data to your supervisor and to privacy@probatioafrica.com within 24 hours, so that we can meet our legal duty to notify the Nigeria Data Protection Commission where required.
- Return or securely delete all study data and materials at the end of your engagement.

8. Conflicts of interest

Declare in writing, before you start, any personal, family, financial or political interest that could affect, or appear to affect, your work — including any link to a programme being evaluated, a client, a supplier or a participant. We do not evaluate work we have delivered, and we decline or restructure work where a conflict cannot be managed.

9. Anti-bribery, fraud and gifts

- Never offer, give, request or accept a bribe, kickback or facilitation payment, directly or through someone else, including to gain access to a community or to speed up an approval. This applies under the Corrupt Practices and Other Related Offences Act 2000 and wherever we work.
- Never accept gifts, hospitality or favours that could influence, or appear to influence, your work. Small tokens of customary hospitality may be accepted and must be declared to your supervisor.
- Use Probatio Africa's money, equipment and time only for their intended purpose, and make honest, documented expense and allowance claims.
- Pay participant reimbursements only as the protocol specifies, and record each one.

10. A respectful and safe workplace

- Treat colleagues with respect. Bullying, harassment, intimidation and discrimination are not tolerated.
- Follow the security plan for each study, including check-in times and travel rules. You may withdraw from any situation you believe is unsafe, and you will not be penalised for doing so.
- A field team is paused if a security incident is reported in its area, if local authorities or community leaders advise it, or if back-checks show problems. It resumes only when the field lead signs off.
- Report accidents, injuries and near misses promptly.

11. Public communication, social media and neutrality

- Do not speak to the media or publish anything on behalf of Probatio Africa without authorisation from the Managing Director.
- Never post photographs, recordings, locations or details of participants or fieldwork on social media.
- While representing Probatio Africa, take no partisan political position and do not campaign. We report evidence; we do not take positions on policy choices.

12. Speaking up

If you see or suspect a breach of this Code, raise it with your supervisor, with the Managing Director, or in confidence at safeguarding@probatioafrica.com. Safeguarding concerns must be raised within 24 hours. No one will suffer any detriment for raising a concern in good faith, and retaliation against anyone who speaks up is itself gross misconduct.

13. Breaches

Breaches are investigated fairly and promptly. Depending on their seriousness, they may lead to retraining, a written warning, removal from a study, dismissal or termination of contract, the withholding of payment for fabricated work, and referral to the police or other authorities. Where a client’s or funder’s agreement requires it, we report breaches connected to their work.

14. Responsibilities of managers and supervisors

Managers and supervisors must make sure their teams have read and signed this Code, lead by example, act on concerns without delay, and never discourage anyone from speaking up.

15. Acknowledgement

Everyone covered by this Code signs the declaration below before starting work, and again whenever the Code is revised.

I have read and understood the Probatio Africa Code of Conduct and the Safeguarding and Referral Policy. I agree to follow them, and I understand that breaking them may lead to dismissal or termination of my contract and to referral to the authorities.

Full name:

Role and study:

Signature:

Date: