

Draft Code of Ethics for Social Performance Professionals

Consultation Phase Responses from Social Practice Forum Members **22 November 2025**

The Working Group is grateful to the 16 individuals who contributed to the member consultation survey conducted between 19 November and 30 October 2025. This document contains the 'raw', unprocessed responses received from all contributors.

Relevance

What is your level of agreement with the following sentence? "The Code of Ethics is quite helpful for dealing with concrete ethical challenges in social performance practice"

	1	2	3	4	5	
Completely Disagree	n=1			n=9	n=6	Completely Agree

Think of a specific ethical challenge you faced in your practice - how would the Code of Ethics have helped you deal with that situation?

"A Code of Ethics is to help us to think along ethical lines, and to parse the different aspects of the challenge so as to communicate with our peers along familiar lines of thought.

One common challenge is explaining that resources are limited; and while we consult with affected populations about the programs and priorities, we do not always reach agreement for a number of reasons therefore the decision on what to prioritize, and fund, often rests with us.

An internal exercise to read the code of ethics as it applies to that specific set of circumstances might inspire changes to improve the effort and its acceptance.

In that sense, a Code of Ethics would help - and for other reasons as well."

"As an in-house SP advisor to the developer team of an energy project in East Africa, I was confronted with an extremely ambitious project schedule and a project management team dominated by engineers and business developers who had agreed to follow the government's top-down approach to community engagement. This left little room for meaningful consultation and developing trust with local communities in an area that already had serious social legacy issues as a result of government-led resettlement. In various (internal) meetings, memos and

discussions with other senior leaders in the organisation as well as through other consultants, I advocated for a more inclusive and participatory community engagement approach and a realistic timeframe that would respect traditional decision-making structures. Despite significant pushback, our internal social team eventually managed to identify several other 'allies' within the project team who recognised the risks and agreed to switch to a different approach.

Although we had already referred to good industry practices and benchmarks (IFC PS, UNGPs and internal SP policies), several of the principles in the proposed Code of Ethics would have provided useful guidance for the dilemmas we faced. Moreover, the Code (and related discussions with peers) could have provided important moral support in those difficult moments and helped strengthen my resolve to continue to push for a participatory approach."

"As an independent Environmental & Social (E&S) consultant engaged by a lender, I sometimes faced the pressure to minimize or understate risks to communities, or focus assessments narrowly on direct impacts, to facilitate project approval or financial closure. The Code explicitly requires maintaining professional objectivity, managing conflicts of interest, and resisting inappropriate pressures that could compromise ethical principles. It would have helped me to communicate my professional obligations to both the lender and project proponent, referencing the Code.

While preparing or reviewing an Environmental and Social Impact Assessment (ESIA), the project proponent may attempt to pre-determine findings, downplay negative impacts, or suppress stakeholder concerns—creating a biased or incomplete assessment. The Code provides space for reflection and discussion of challenging situations, helping me to frame ethical issues in terms of principles and impacts rather than personal confrontation. This shifts the conversation from personalities to professional standards. The Code requires you to practice within your competence, use valid methods, and fully disclose your methodology, limitations, and potential biases. By referencing the Code, you can depersonalize ethical conflicts/challenges and foster an environment where ethical practice is the norm (best practice)."

"Client staff member (named in a grievance) undermining grievance mechanism. the CoE principles: 1. respect for HR and dignity, 2. professional independence and integrity; and, 5. multi-stakeholder accountability would support the basis for and evidence and ethics based challenge to the situation."

"I have often felt pressure from clients to adjust deliverables or refine guidance / advice in ways that are favourable to them, but the principle of "professional independence and integrity" under the Code of Ethics serves as an important reminder of how this must always be ensured in any of the services that I provide."

"It serves as a reconfirmation that ethical challenges are common in our profession and that peers are facing similar issues."

"Justification of taking a particular position"

"Pressure to cut corners and expedite (which could limit participation and lead to unsustainable solutions which will not last) or penalize the very people we are trying to acknowledge and help."

"Reframe my 'internal' conversation"

"Reframing my work into the broader social performance context and allow me to be more critical of corporate pressures."

"Sometimes in the rush of field work, field teams just want to collect data, understand the social context and often make a difference. Now, the problem is what "making a difference" means. After reading the "Confidentiality and Privacy" principle I notice that I might have disclosed personal information in past to "make a difference" without proper consideration. The code of ethics is useful to create this awareness."

"The ethical challenge was the misalignment between company standards vs. government regulations. The code of ethics helped to test and challenge the project team with what would be the appropriate approach avoiding harm to the community (even it is cost more and was beyond the regulatory requirement)"

"The main problem in practice is that in the current framing of SIA and social performance it is a fully developer-driven process and as consultants we are structurally captured being dependent on developers for paid work. The code of ethics is quite performative by focusing on individual ethics - however, the crucial ethical issue is how the system is conceptualized and implemented. The code of ethics falls short of critiquing the system and therefore risks enabling harm through performance."

"Working with other consultants who aren't committed to improving their practice. "We practice within the limits of our competence by seeking guidance when necessary and continuously developing our professional knowledge and skills to enhance our expertise.""

Think of a specific ethical challenge you've encountered that is not adequately addressed by the Code - how could the Code of Ethics be improved to help you deal with that situation?

"Bribes and compliance with national laws"

"Further refinement of (5) Multi-Stakeholder Accountability."

"I have to sign NDAs so even when I see harm I can't expose it - I have to walk away but that doesn't help stop the harm. By focusing on individual consultant agency we are missing the ethics of the system. It isn't enough to claim to be ethical in an unethical system."

"I think there is a tension between adhering to a code of ethics and the practical application of social performance in a project. What I mean is that the code of ethics is framed from the perspective of the practitioner. While the code acknowledges the needs of multiple stakeholders

and the importance of balancing those needs, the project team or the community may not follow or acknowledge the same code and may not even be aware of it."

"I'm not saying I've encountered this, however this is not my first Code of Ethics (CoE): we have not stated what is expected if we become aware of a peer who is not practicing to the standard set by our community of practice and this CoE. What if the Social Practitioner knew beforehand about the Juukan Caves? Or if they did not collaborate enough with others on the project so as to stay properly informed about how environmental and construction activities might impact their lives? Or if they hired informal daily workers and paid them out of petty cash (maybe underpaid them) without providing adequate security and PPE for these workers? Should the CoE give us guidance on reporting it or not? And, if yes, to whom would we report it?"

"Influencing outcomes, by imbedding ethical considerations in high quality business decisions along with legal and practical implementation criteria"

"Something that the Code of Ethics does not consider is the set of individual and social psychological forces that can lead to unethical behaviour. The Code is what can be named the prescriptive norm, what should be done, but we often behave in ways that differ from what should be done, the descriptive norms. Theoretical frameworks from social norms and social dilemmas could help to understand and prevent this misalignment in the context of SPP."

"the Code of ethics is less strong with regards to supporting positive change in terms of impact (beyond preventing and managing harm). I also wonder about if under principle 6. there needs to consider inclusion of behaviour that may discredit the individual and the profession?"

"This may be out of scope but in most of my work, one challenge and key element of our "value proposition" was to increase wealth (especially for Indigenous communities). I am thinking here about the commitment to create (economic) value - in a manner that is equitable - so as to allow communities to be more independent and work towards their self-determination goals."

"Uncertain as I feel that the Code deals with many of the core issues encountered in my work."

"While the list provided covers the essential aspects of a code of conduct for a social performance specialist, perhaps what is missing is a key principle related to long-term impact and sustainability. A principle addressing a: Commitment to Sustainable and Long-Lasting Outcomes or Resilience could be a relevant addition. The list includes "Preventing and Anticipating Harm," which focuses on immediate risk mitigation. A social performance specialist must also consider how to generate durable, positive change and contribute to resilience for communities and other stakeholders, not just avoid negative impacts and preventing harm. In that sense, the provided list of principles is strong on preventing harm but less explicit on positive impact and resilience, beyond the broad "Community Ownership and Empowerment". A specific commitment to creating lasting positive change strengthens this aspect."

Clarity

What is your level of agreement with the following sentence? "The Code of Ethics is very clear in the way it describes its principles"

	1	2	3	4	5		
Completely Disagree	n=1		n=2		n=4	n=8	Completely Agree

Are there any principles where you can suggest improvements to clarity or to any terms or concepts used?

"Five of the 10 begin with ""We ..."" and the others do not. I like the 'We' voice and think they should all read the same way.

I would add one proviso about our duty to act if we see an error or omission or otherwise an example of wrongdoing, also see the question just before this one."

"I feel the need to have more details about the methodology to arrive to these principles and a practical example for a violation of each principle from real world experience."

"Lexicon around corruption"

"Multi-Stakeholder Accountability"

"Overall, I'd say that the particular situation Indigenous peoples are facing would warrant recognition in our principles. This said, I understand the idea of keeping it general and neutral but from where I sit (Canada), it hardly makes sense to not mention this particular case somewhere in a principle-based C of C..."

"Principle 5 (Multistakeholder Accountability) mentions "a commitment to fairness". I would define this as referring to relations between stakeholders that are equitable, respectful and strive towards a just outcome. But I'm curious how the working group (and other SPF members) define this in relation to our practice?"

"see earlier point re. principle 10, though principle 2. may be a better fit if we want to mention avoiding discrediting the profession? Another thought, is it helpful to specifically include (footnote) key references e.g. fundamental human rights, or meaningful engagement? Is it assumed that we will always operate within the law as a minimum?"

"The problem with SIA and Social performance, which can be considered to be interchangeable, is that they are just a sequence of social science tools which represent a methodology and not a

worldview or framework. The SPF Code treats ethics as individual conduct within a top-down procedural system.

Without a clearly articulated worldview and governance framework, it risks being performative — legitimising harm through moral language.

SPF should first decide what worldview it promotes and what governance framework reflects that, before codifying ethics to support it. I have promoted one framework - FELA - there are others but the SPF needs to be clear about what framework underpins ethics grounded in social theory."

"Very clear principles"

"Whilst I fully agree with the principle of "multi-stakeholder accountability", I am conscious that addressing the needs and concerns of all stakeholders in undertaking my work can be very challenging in reality, particularly when these are very divergent or conflicting. Sometimes finding a common ground is very difficult (near impossible) and I think that needs to be reflected / acknowledged in the description of the principle somehow."

Implementation

What is your level of agreement with the following sentence? "I can anticipate several barriers to the application of the Code of Ethics in my work"

	1	2	3	4	5	
Completely Disagree	n=2	n=2	n=5	n=5	n=1	Completely Agree

What barriers or enablers do you anticipate in applying this Code in your work?

"A justification if pushed by a board for example"

"At an individual level, as mentioned before, there are barriers intrinsic to how human cognition processes and influenced by social norms (e.g., social dilemmas). At the group level there are barriers intrinsic to team dynamics and leadership (e.g., psychological safety). At the organizational level there are barriers stemming from cultural core hidden assumptions (e.g., assumption about business, social performance, host communities)."

"Barriers: Client organization acceptance: Client organizations, especially those in high-stakes industries, may resist or disregard the social performance code of conduct if they perceive it as an obstacle to their operational or financial goals. This can lead to direct conflicts and pressure on specialists to compromise their principles. Scope creep and unrealistic demands: Some clients may continually expand the project scope or impose unrealistic deadlines, creating an environment where corner-cutting is encouraged. A social performance specialist must have the

ethical fortitude to resist such demands and hold the client to the agreed-upon code. Conflicting legal and ethical obligations: A specialist may face a difficult situation where their ethical duty (e.g., to inform a community of potential harm) conflicts with a client's legally binding non-disclosure agreement. In such cases, the specialist would need to weigh the professional and personal consequences of prioritizing the code over their contract.

Enablers: Professional associations and peer support: A strong professional body can provide training, peer review, and a clear reporting channel, which reinforces the code's importance. A community of like-minded practitioners can provide moral and professional support to resist client pressures. Ethical decision-making frameworks: Providing a practical, case-based framework for ethical dilemmas empowers specialists to make sound decisions. This moves the code beyond principles and into a daily professional tool. Contractual embedding: Incorporating the code's core principles directly into client contracts makes it a non-negotiable part of the professional relationship. This clearly defines roles, responsibilities, and ethical expectations from the start."

"Barriers: time / project schedule; limited project budget for SP; limited understanding + not enough 'critical mass' (i.e. SP allies) within the project team or pushback from other stakeholders (especially government)

Enablers: strong peer support (e.g. through SPF membership circles / meetings to confidentially discuss ethical dilemmas)"

"Clear roles, accountabilities and ownership. There is also a risk of cherry picking certain principles."

"Corporate deadlines and timelines"

"I don't anticipate a change, however as mentioned in an earlier response, I suspect this CoE will help me to communicate about it more effectively with my peers and fellow practitioners."

"Practical implementation guidelines and examples of how ethical issues have been overcome elsewhere"

"The barriers that are most in my mind are: independence, when client perspective/expectations re. an outcome, approach or budget/time constraints challenge the ability to maintain independence as well as limit the ability to ensure the design and implementation of an approach that delivers on 3, 4, 5, 7, 8 in particular. I think principle 10. speaks to this well, but it is more subtle than when our work is used in harmful ways by others, it is more about deficiencies in the approach that limit the meaningful involvement of affected stakeholders. In terms of enablers, the existence of the code of ethics is foundational for supporting our work, educating the client, building trust with other stakeholders, and hence can support better quality processes and outcomes."

"The lack of courage, clients not being ready to walk the talk. Faced this problem several times and it kills relationships, trust and partnerships."

"the main barrier is recognition by the project team and non SP practitioners that SP practitioners will abide by such a code"

"The SPF through this code is enabling a system that denies affected communities any real voice or agency in the project decision-making process which could help to prevent harm. This individual code of ethics risks positioning the SPF as 'disempowering saviours' - virtue signalling ethics while gatekeeping community voices and denying them agency. For the SPF to move from a para-discipline to a professional discipline, a model first needs to be developed which has a worldview grounded in social theory. The 2015 SIA Guidance was groundbreaking at the time with a focus on moral realism - this has faded in recent years. We need to ensure that we as a group are promoting an ethical harm-prevention system. We might not have that much agency as individuals but we have as a group in identifying a system we believe will prevent harm. I couldn't apply this code as it is performative in a system which in itself enables harm."

What is your level of agreement with the following sentence? "The Code of Ethics would strengthen my position when advocating for ethical practices"

	1	2	3	4	5	
Completely Disagree	n=1		n=3	n=5	n=6	Completely Agree

How exactly could this Code strengthen or weaken your position when advocating for ethical practices?

"Again justification that it's not just me"

"Contractual leverage: When the client accepts your Code of Conduct in the project contract, it becomes a binding part of your agreement. This gives you formal leverage to advocate for ethical practices. It moves a request from a personal opinion to a contractual requirement. Including the code in the contract creates an agreed-upon standard for assessing and addressing ethical issues. De-personalizes the principles and conflicts: Citing an established principle shifts the discussion away from a personal disagreement. This can lower the client's defensiveness and allow for a more objective conversation about the issue at hand."

"I don't think it would have an effect in my direct attributions but could be used as a tool to raise awareness within industry forums, lenders, governments etc"

"I feel it could strengthen my position by having a solid document to refer back to and being able to explain the history / evolution of the document (i.e., where it came from). At the same time, it

is not legally binding nor internationally upheld and so it may not hold a huge amount of clout when referencing it to a Client / using it to defend me somehow.”

“I spoke to this in my last point - being clear that my work is governed and supported by the code of ethics is important for clients and other stakeholders alike. It frames how I will act and what I expect as much as what they can expect of me.”

“I'm impartial about this; I don't believe it will improve or diminish the situation. Project Managers, technical professionals, and teams will seek an SP practitioner who demonstrates experience and sound judgment, as they perceive it.

In my experience, I feel confident advocating for and making decisions on ethical practices independently. However, I believe this Code can be especially valuable for professionals who may not yet feel empowered to speak up or take a stand.”

“It could help to have a well-articulated set of principles; however we are not empowered to enforce them and that renders it a bit toothless. Still: it is necessary and I am glad to have it.”

“It is well constructed and provides clear language which I can see myself using when trying to advocate for more ethical practices. I like and agree with the principles-based approach. This can be adapted to any organisation notwithstanding their level of social performance maturity.”

“It significantly weakens my position because it codifies the idea that social performance practitioners can work within an unethical governance system - one that enables developer domination - and that our agency is harm-prevention when we are structurally captured by developers. It will weaken social practice and not align with the spf founding objective of empowering communities - if we position ourselves as gatekeepers we deny communities agency and inhabit an unethical role of the 'disempowering saviours'. The ethical position is to present a model that proposes an ethical process for decision-making that prevents harm and work to promote that.”

“It would allow me to discuss with management about generally accepted principles in my profession that may be at odds with corporate pressures - something other professions like legal and financial experts could appreciate”

“Many people on the receiving end of an "ethics talk" either strive challenge its legitimacy or avoid the conversation altogether. Having a Code that has been developed by a group with the technical knowledge (competence), that has the best interest of the practice in mind (benevolence), and that is oriented towards something positive like professional growth (affection), has all the building blocks of social trust and might create more permeability.”

“Well defined principles such as the IAP2 Spectrum can lend credibility to your position.”

Support

What is your level of agreement with the following sentence? "I require additional tools and support to be able to implement the Code of Ethics in my work"

	1	2	3	4	5	
Completely Disagree	n=2	n=3	n=4	n=5	n=1	Completely Agree

What specific resources would you need to effectively implement these principles and in what format should they be available (e.g., online training)?

“A concerted effort to the broader SP community to raise awareness of the topic and reach those more mistrusting of the benefits. For instance, a series of webinars with open discussions (Q&As) with invited guests that are developers.”

“Case-based training, either in print or online.”

“Discussions with peers in projects or SPF members to discuss examples of ethical dilemmas and practical solutions / guidance on what worked / didn't work elsewhere”

“Examples and case studies of practical implementation”

“I think case studies are really useful.”

“I would like to see how others consider it before responding.”

“Industry acceptance of the code”

“Not quite sure on this as haven't thought enough, but I think it would be helpful for practitioners to understand what each principle could mean in practice, little case studies/examples from other practitioners, reference points for recognised standards or guidance.”

“Online training would be fine but probably a communication or training package which I could use when pitching this to clients, partner organisations, etc.”

“This reads more like a consulting offering and risks enabling harm.”

“To address the challenges of lacking reinforcement and client resistance, a robust peer support and review system will be welcomed. Case Studies Library: A repository of anonymized ethical dilemmas and their resolutions. These real-world examples illustrate how the code's principles can be applied and help specialists learn from the experiences of others. Mentorship Program:

A structured program that pairs specialists with more experienced peers. This fosters a supportive relationship where ethical concerns can be discussed discreetly and confidentially. Regular Virtual Meetings: Facilitated video conferencing sessions where peer groups can meet to discuss difficult cases and provide mutual support. Workshops on Ethical Dilemmas: Facilitated sessions to discuss and analyze real-world case studies, allowing specialists to practice ethical reasoning and develop their professional judgment.”

Consider the following list of support options:

	How Important to properly implement the Code of Ethics?			How frequently would you use then?		
	1 - Unimportant	2	3 - Important	1 - Infrequently	2	3 - Frequently
Decision-making frameworks	4	4	7	5	6	3
Peer support groups	1	3	11	5	6	4
Case study database	3	3	9	3	7	4
Ethics advisory service	2	5	8	6	6	3
Training workshops	3	4	8	5	5	4
Other (please specify)			4	2		2

- Conflict of interest support within SPF (e.g. between a member employed by a company and a consultant member working on the same project).
- Webinars
- Circulating past experiences even if the person is still around.
- Reference information for terms such as 'meaningful engagement'

Consultation

What is your level of agreement with the following sentence? "The review of the Code of Ethics should extend beyond the SPF group"

	1	2	3	4	5	
Completely Disagree	n=1		n=4	n=3	n=7	Completely Agree

In your opinion, which stakeholder groups should review this Code?

“Academic institutions teaching social performance; Business organisations claiming commitments to responsible management of social impacts, relationships, etc.; leading influential companies (e.g., xxx where I used to work); some larger broad-reaching NGOs...; etc.”

“Affected stakeholders”

“AIATSIS, FNMP and ICOMOS.”

“Civil society groups representing rights-based justice. This would show that the ethics are performative.”

“consider feedback from groups including: key affected stakeholders' groups or representatives e.g. IPs, Resolve; companies or sector organisational that use our services e.g. ICMM, IPIECA and/or member companies with strong SP performance/ awareness, IFIs; academic expert groups e.g. CSMI; Other professional associations that may have already been through this process and know some of the pitfalls?”

“It would be useful to work towards broader industry buy-in (e.g. ICMM).”

“Lenders, big ESG consultancies, industry forums (ipieca, icmm etc), governments and ngos N/A - I remain very much on the fence about this one! My gut feeling says it is something that we should use for internal purposes only (or at least at this stage).”

“Social Impact Assessment section within IAIA”

“Social performance professionals, both independent consultants and those working within companies”

“SP professionals, Developers, DFIs, Indigenous People groups”

“stakeholders that work closely with SP practitioners”

“The SPF group is the important one at this point: we do not regulate our group members (ours is not a professional body). If other groups are asked to comment, they may request confidentiality.”

Additional comments

“It would be useful to find ways to expose more local SP professionals, increasingly used in areas like West Africa, who are not SPF members - hence finding ways to have them adopted by bodies like ICMM and IFC performance standards could be one approach.”

“Just a massive thank you to the Working Group who developed the Code and took the initiative to do so. It is really admirable and greatly appreciated, particularly given how busy everybody is, and is truly in the spirit of the SPF.”

“Overall, an amazing draft. Thanks to everyone that worked on the Code of Ethics. This is important and timely.”

“The SPF Code is a start, but it treats ethics as individual conduct within a top-down procedural system.

Without a clearly articulated worldview and governance framework, it risks being performative — legitimising harm through moral language.

SPF should first decide what worldview it promotes and what governance framework reflects that, before codifying ethics to support it.”

“The SPF Code of Ethics would benefit from further internal discussion on its implementation, particularly in situations where conflicts may arise, such as when an SPF member employed by a company works on the same project as another member acting as an independent consultant.”

“Well done on all the work so far.”