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# SAFEGUARDING CHILDREN AND VULNERABLE ADULTS POLICY

This safeguarding policy sets out Nonviolent Peaceforce commitments to protect our staff, individuals, and the communities we serve from abuse, exploitation and organisational negligence and the procedural framework and guidelines in place to safeguard against, and respond to, incidents effectively.

## **Authorisation**



Lucy Nusseibeh  
Board Chair

Signed: 04.03.2021

Nonviolent Peaceforce International

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## Introduction

Nonviolent Peaceforce (referred hereafter as “**the Organisation**”) is a Swiss-registered, global non-profit organisation. The Organisation’s mission is to work towards the protection of civilians in violent conflicts through unarmed strategies. The Organisation builds peace side by side with local communities and advocates for the wider adoption of these approaches to safeguard human lives and dignity.

Safeguarding is of paramount importance to Nonviolent Peaceforce. This policy aims to raise staff, representatives, partners, and volunteers’ awareness of safeguarding risks and to provide those who have experienced, witnessed or suspect abuse, maltreatment, or neglect with the means to address the matter.

The Organisation is committed to ensuring a safe and respectful environment in all project sites and offices worldwide, including a zero-tolerance towards any form of bullying, harassment and sexual exploitation and abuse of any person that encounters its staff and/or representatives, either directly or indirectly. The Organisation recognizes the additional responsibility of safeguarding children and vulnerable adults that are involved in its programming. Therefore, the Organisation has adopted this Safeguarding Children and Vulnerable Adults Policy (hereafter referred to as “**the Policy**”) that covers these specific groups outlining how to prevent, report and respond to safeguarding concerns. This Policy applies to all people regardless of their background, age, class, gender, ethnicity, religion, ability, or sexual orientation.

This Policy does not cover bullying and harassment, including sexual harassment in the workplace, as these matters are already covered in the Organisation’s Global Staff Handbook and the Discrimination, Harassment and Sexual Misconduct Policy, 2016.

## Definitions and Terminology

1. “**Safeguarding**” refers to the responsibility and duty of care exercised by the Organisation’s staff, representatives, and partners who are in positions of trust and responsibility to protect children and vulnerable adults from the risk of harm, abuse, exploitation, and harassment that may be caused by those staff or representatives through their behaviour, programmes, or activities.
2. “**Protection**” refers to the protection of the health, wellbeing and human rights of all people and enabling them to live free from harm, abuse, exploitation, neglect, or death. In the international development sector, it generally refers to protection programming.
3. A “**child**” is defined as any person under the age of 18 in accordance with Article 1 of the UN Convention on the Rights of the Child, 1989. The Organisation recognizes that some children may be more vulnerable to abuse due to personal and external circumstances, e.g., sexual orientation, children with disabilities, recent trauma.
4. A “**vulnerable adult**” is someone aged 18 or over who is or may need support by reason of disability, age, gender, illness, or external circumstances such as poverty or disaster. S/he is or may be unable to take care of or protect her/himself or against harm or exploitation.

5. This Policy aims to protect and safeguard children and vulnerable adults who benefit or are part of programmes and projects supported by the Organisation globally from the **different forms of abuse, exploitation and neglect** that are covered in this Policy, found in “[Appendix A](#)”.
6. This Policy applies to all staff, representatives, and partners of the Organisation:
  - a. “**Staff**” includes all employees that are paid or unpaid, working part-time or full-time for the Organisation.
  - b. “**Representatives**” will include paid or unpaid volunteers, interns, Board members, advisors, consultants, visitors, media and journalists, partners, suppliers, and 3<sup>rd</sup> party contractors who represent the Organisation in some way.
  - c. “**Partners**” or “**Suppliers**” refers to any local or international organisation that the Organisation enters into a contractual agreement with to implement its activities and programmes.
7. “**Safeguarding Officer(s)**” – One or two members of the senior management team who are in designated positions of authority to receive safeguarding concerns and to act on these. They will keep a detailed register of all safeguarding issues raised and how they were dealt with including how historical allegations have been dealt with separately. (Refer to [Appendix J](#) of the Safeguarding Procedures for the roles and responsibilities of Safeguarding Personnel.) They support Safeguarding Focal Persons who are in-country or specific to projects.
8. “**Designated Safeguarding Director**” – a designated member of the Board of Directors who oversees the compliance of this Policy and Procedures as well as safeguarding more generally. They should also ensure that “Safeguarding” is a standing agenda item at the Board and will report to the Chair of the Board.

## Key Principles

Safeguarding children and vulnerable adults must follow the following key principles:

- **Best interest** - all safeguarding actions must be taken in the best interest of the complainant or survivor.
- **Accountability and transparency** – The creation of a culture and environment in which they are valued, listened to, and their right to be safe is upheld, and where safeguarding concerns are reported and dealt with quickly and appropriately.
- **Prevention** – The reduction and management of risk where staff and representatives have direct or indirect contact with those involved in activities and service provision.
- **Reporting** – Clear reporting and management lines where concerns can be raised and managed in a timely and appropriate manner are clear and known to staff, representatives, partners, and beneficiaries.

- **Response** – Taking immediate steps are taken to prevent further harm and investigate and deal with concerns appropriately, including working together with other organisations that have a responsibility to safeguard and protect children and vulnerable adults.
- **Learning** – Ensure lessons learnt are swiftly incorporated back into improving this Policy, procedures, and safeguarding practice by the Organisation.

### Policy Statement and Application

1. This Policy seeks to ensure that the protection of children and vulnerable adults is paramount in every area of work at the Organisation, such as programmes, fundraising, communications (internal and external), gender sensitivity, Human Resources, IT and Finance, and should be reflected in other organisational policies.
2. This Policy applies to all staff, representatives and partners of the Organisation as listed in the definitions and terminology section of the policy. Partner agencies including downstream, implementing partners working with the Organisation will required to comply with this Policy and its processes unless and until such time that they have organisational policies of their own that are based on similar standards.
3. All managers within the Organisation are expected to promote this Safeguarding Policy and are accountable for its implementation, including ensuring new hires undergo thorough safeguarding orientation, and all existing representatives undergo regular refresher training to ensure everyone understands fully the expectations around behaviour, how to manage risks, and how to report and respond to any safeguarding allegations.
4. Reporting suspected or actual abuse is a mandatory and professional obligation of staff and representatives. We are all required to play an appropriate part in holding everyone who carries out duties on behalf of Nonviolent Peaceforce or who is perceived as representing the Nonviolent Peaceforce mission accountable. Failure to report concerns to Safeguarding Officers of the Organisation can lead to disciplinary action or dismissal. This applies even to those staff or representatives who have no direct contact with children and vulnerable adults in the course of their work.
5. This Policy and the accompanying Procedures are based on international standards, UN Conventions and International Safeguarding Standards, such as:
  - UN Convention on the Rights of the Child 1989;
  - UN Convention on the Elimination of Discrimination against Women (CEDAW), 1979;
  - UN Convention on the Rights of Persons of Disabilities, 2006;<sup>1</sup>

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<sup>1</sup> <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities.html#Fulltext>

- Inter-agency Standing Committee on Preventing Exploitation and Abuse (IASC PSEA);<sup>2</sup>
- DFID Enhanced Due Diligence Standards adopted by USAID and other institutional donors.<sup>3</sup>

Where there is a discrepancy between national laws, international standards, or this Policy, the higher standard will prevail.

## Implementation of the Policy

1. The implementation of this Policy lies with the senior leadership and is overseen by the Safeguarding Officers (SO) and the Designated Safeguarding Director and/or Safeguarding & Accountability Committee. As part of the Organisation's commitment to safeguarding, it will ensure that:
  - All recruitment and human resources management procedures include a risk assessment and proper background checks (see [Section 1 of the Procedures](#));
  - Staff and representatives are inducted and trained in this Policy (see [Section 2 of Procedures](#));
  - All staff and representatives will be required to sign the Statement of Commitment form and abide by the Code of Conduct ([Appendix B](#)) as a condition of their engagement with the Organisation;
  - Procedures for dealing with allegations of abuse against staff, representatives, and those of partner agencies are communicated clearly;
  - Each country programme or project location (as far as reasonably possible) has at least one named safeguarding focal person who will receive concerns and report to the Safeguarding Officer at Head Office;
  - All media and communications protocols where children and vulnerable adults featured comply with [Section 4 of the Procedures](#);
  - Partner agencies are informed of the Organisation's expectations of them around this Policy and procedures, and arrangements are in place to safeguard and respond to any safeguarding concerns, including arrangements for sharing information ([Section 5 of the Procedures](#)). The Organisation has a responsibility to support partner organisations' compliance with this Policy, and assist them in developing their own Policies and Procedures fit for their context
2. There is a Designated Safeguarding Board Committee (the Safeguarding and Accountability Committee – SAC) where concerns can be brought to the Organisation's Board. Additionally, safeguarding shall be a standard agenda item at Board meetings. The Safeguarding Officers shall provide the Designated Safeguarding and Accountability Board Committee current data (in a confidential way) on compliance with this Policy as well as challenges to managing safeguarding risks in the organisation.
3. A culture that respects and protects children and vulnerable adults is cultivated in the organisation, led by the Board and senior leadership.
4. Children, vulnerable adults, and all those who benefit from the Organisation's projects and

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<sup>2</sup> <https://interagencystandingcommittee.org/inter-agency-standing-committee/iasc-six-core-principles-relating-sexual-exploitation-and-abuse>  
(Amended Sept 2019)

<sup>3</sup> <https://www.gov.uk/government/publications/dfid-enhanced-due-diligence-safeguarding-for-external-partners>

programmes must be provided with every opportunity to have their voices heard through feedback and complaints mechanisms which the Organisation will set-up, including sharing concerns around the behaviour or activities of the Organisation, its representatives, and partners. Such mechanisms will be appropriate to the age, gender, and context of those who participate in the Organisation's programmes.

### Expectations of Behaviour

The Organisation's Safeguarding Policy Code of Conduct (CoC) takes the best interests of the children and vulnerable adults with whom it works with as its primary consideration and outlines appropriate and expected standards of behaviours of its staff and representatives towards all children and vulnerable adults. The Code of Conduct:

- specifies appropriate behaviour required of staff and representatives while they are engaged in, working for, or working on behalf of, the organisation;
- reduces the risk of inappropriate behaviour thereby mitigating the risk of misplaced allegations; and
- ensures that children and vulnerable adults feel safe when in contact with the Organisation's staff and representatives.

It is a mandatory requirement that all staff and representatives adhere to the CoC within and outside the workspace and will sign their commitment.

All partner agencies must be made aware of the CoC and are expected to sign and fully comply with all its provisions. This should be included in all Memoranda of Understandings, contracts, sub-awards, and all other partnership arrangements.

Any breach of the Policy and/or CoC will result in consequences for its staff, representatives, and will vary depending on their relationship to the Organisation and the nature of the misbehaviour. Steps followed and consequences could include:

- An internal or external investigation into the alleged breaches;
- Disciplinary action or immediate dismissal;
- Referral to the national police authority and, in cases of grave violations, to the police at the country of origin of the perpetrator;
- Suspension and/or ceasing of activity, relationship, funding, or engagement; and
- Suspension and/or cancellation of the contract or partnership.

The Organisation will also be required to share specific information with donors' relevant regulatory bodies, law enforcement and protection agencies as appropriate.

### Revision

This Policy will be revised every two years to ensure compliance with international standards and updated legislation, as well as incorporating lessons learned.

## Alignment with Existing Organisational policies

This Policy will be read together with:

- NP Global HR Manual
- NP Child Safeguarding & Ethical Conduct policy
- Grievance Policy
- Whistleblowing Policy
- Discrimination, Harassment and Sexual Harassment Policy
- NP Recruitment Policy, 2019

In the event of inconsistency in policies, the higher standard will apply.

# SAFEGUARDING CHILDREN AND VULNERABLE ADULTS PROCEDURES

## 1. Safe Selection, Recruitment and Onboarding Procedures

The Organisation is committed to ensuring that safeguarding is integrated into all selection, recruitment, and onboarding processes. Hiring managers will ensure that:

- All job descriptions and job postings must detail responsibilities, to include:
  - The qualifications and experience required, and any additional criteria if working directly with children and/or vulnerable adults
  - The competencies and qualities that the applicant should be able to demonstrate when in direct contact and indirect contact with children and vulnerable adults
  - How these competencies and qualities will be tested and assessed during the selection process, and what checks and references will be required (including for those candidates applying from both inside and outside Switzerland)
- All job descriptions and job postings must state that the Organisation has a zero-tolerance towards abuse and exploitation of all people and that successful candidates will be expected to comply with this policy and other policies.
- Candidates who are selected for an interview will be asked to read this Safeguarding Policy and Code of Conduct (CoC) only (not the Procedures) in advance of their interview (**Appendix B**). This will be sent to candidates, together with the invitation for an interview.
- All hiring managers must have taken training in safeguarding and undertake the responsibility to include specific, standardized safeguarding questions in interviews (see examples in **Appendix C**). Hiring managers should pay particular attention to gaps in an individual's employment history and frequent changes in employment.
- All candidates selected for an interview will be required to provide proof of identity (passport, driver's license, original ID documents) and certificates to prove professional qualifications at the time of interview. Permission should be sought to take a copy based on data protection regulations. Successful candidates will be required to provide originals of these documents to be checked against these copies. The HR Department should confirm the documents are genuine, original, and unchanged, and belong to the person who has provided them.

- Before commencing work or within the first week, all new staff and representatives will be required to sign the Statement of Commitment in this policy together with the Code of Conduct ([Appendix B](#)) and a Self-Declaration of Criminal and Disciplinary Record ([Appendix D](#)). Signed copies will be kept with personnel HR records.
- All new Job Descriptions will be risk assessed and successful candidates who will have responsibility for or have direct or indirect access to children and vulnerable adults will be required to undertake a mandatory police background check (appropriate to the role, responsibility, and access).
- Whenever the local situation and legislation allows it, all successful candidates who will have responsibility for or have direct or indirect access to children and vulnerable adults will be required to undertake police checks in the countries that they have resided in within the last 5 years. The application process for criminal records checks or 'Certificates of Good Character' varies from country to country.
- The HR Department will obtain a minimum of three (3) references for all prospective employees and representatives (e.g., from the individual's current line manager, human resources department, previous line manager, and a character reference from a professional person). References from family members or friends will not be accepted. References will be verified in person or by phone by the individual's line manager and/or HR. Where given references cannot be verified in this way, the HR Department will contact previous employers other than those cited as referees.

#### **On Appointment:**

- All new hires as staff, representatives or Board Members will go through an onboarding process. All staff and representatives must have a safeguarding and code of conduct orientation within two weeks of their starting. This must be recorded on their personnel file.
- The end of probation period interview with the individual's line manager will include an assessment of the commitment of the staff or representative to following this Safeguarding Policy and the Code of Conduct.
- A mandatory refresher workshop will be provided to staff and representatives annually.

## **2. Reporting, Responding and Investigation**

### **2.1 Be Alert**

Staff and representatives who come into contact with children and vulnerable adults, whether directly, through partners or via advocacy and campaigns should always:

- Be alert to potential indicators of abuse, neglect, exploitation, or harassment and recognize that a child or vulnerable adult may need help;
- Be alert to the possible risk which the Organisation or its representatives may pose to children and vulnerable adults because of the culture of trust;
- Be able to respond appropriately when a safeguarding concern is raised;
- Ensure their behaviour always complies with the Code of Conduct;
- Conduct a safeguarding risk assessment before any activity, programme or when managing investigations ([Appendix F](#))

## 2.2 How to Report

- To report any incidents of abuse, exploitation, neglect, harm, and/or harassment, regardless of whether it needs medical intervention or not, staff are requested to contact the Head of Mission and/or lead Safeguarding Officer on where they are based;
- If the child or vulnerable adult is suffering from a serious injury, the staff member/manager must seek medical attention immediately and must inform the appointed Safeguarding Officer or Focal Person if in the field;
- If the alleged incident involves a staff or representative of the Organisation or is connected to the Organisation's operations or activities, the staff member/manager must inform the Safeguarding Officer or Focal Person immediately;
- If the matter is a crime, a report may be made to the local law enforcement agency if it does not put the complainant at greater risk;
- All communication must be recorded using the agreed Safeguarding Incident Report Form (refer to [Appendix G](#)). A copy of this form should be sent under confidential cover to the named Safeguarding Officer(s) (or Designated Safeguarding Trustee as deemed appropriate) within 24 hours. Electronic copies saved in the protected drive and paper copies kept under lock and key. Any reports of concern should be always kept confidential i.e., only shared with those who need to know;
- Staff who need further guidance or who are not satisfied with how their concern or complaint has been addressed by the relevant mission, should contact the lead Safeguarding Officer and/or HR Manager at HQ.

### The Organisation's staff and representatives **should not**:

- Investigate the alleged incident themselves
- Make assumptions or offer alternative explanations
- Promise total confidentiality; instead, they should give assurance that the information will only be shared with the Safeguarding Officer

### The Organisation's staff and representatives **should**:

- Send a Safeguarding Incident Report Form (refer to [Appendix G](#)) to the Safeguarding Officer no later than 24 hours from the concern arising. Where possible, the report should record the incident in the words of the child and/or vulnerable adult who made the disclosure. The report should include as much detail as possible i.e., time, date and place of incident/s, persons present and what was said.
- Sign and date the written record

## 2.3 Responding to Disclosures

Children and vulnerable adults may indicate that they are being harmed in several ways (refer to [Appendix A](#)). If someone tells you or you observe that they are uncomfortable or feel unsafe, you should:

- Take them out of harm's way, to secure premises if necessary, and ensure that they are not in any contact with an alleged perpetrator, and that this person(s) cannot access or threaten them in any way;
- Reassure them that they were right to report the behaviour.

- Listen carefully and ask clarifying questions to ensure you report the incident accurately.
- Do not repeat the same questions back to them, as this may give them the impression that you do not believe them or what is being said.
- Do not promise secrecy. Be open and honest about the fact that you must report the allegation to the Safeguarding Officer.
- Ensure that the physical safety and psychological well-being of the child or vulnerable adult are secured. This may include referring them for medical treatment or to counselling services if available. (Consent may need to be sought to do this as appropriate).
- Do not allow personal doubts to prevent you from reporting an allegation.
- Explain to the child or vulnerable adult what you are going to do and what will happen next that may be within your knowledge. The Organisation should keep the complainant(s) informed of the process without breaching confidentiality.

**Note:** A failure by any staff member, representative, or partner to report a safeguarding concern in accordance with this Policy and Procedures is a disciplinary matter. The Organisation views the safety of children and vulnerable adults as paramount. It is always better for staff and representatives to report even if they are uncertain. No member of staff or volunteer should allow safeguarding concerns to go unreported internally, even if the concern is based on unverified information or inconclusive evidence. Reports should also be made directly to the Safeguarding Officer(s) or the Designated Safeguarding Board member/Committee (if deemed appropriate).

## 2.4 Next steps

If a concern of any harm has arisen, the Safeguarding Officer(s) will convene an internal consultation with the designated Safeguarding Board member and other persons who need to know, to make decisions as to next steps.

This may involve:

- Undertaking of any risk assessment and making further inquiries
- Reporting to local law enforcement and or national authorities or any other external bodies if the matter is deemed to be criminal as required under the law
- Informing institutional donors or funders on the outcome of an investigation and the steps taken
- Providing a referral to support services to the survivor(s), witnesses, and their families
- Monitoring the progress of further inquiries and provide on-going guidance as appropriate
- Liaising with senior managers if an internal investigation is going to take place
- Liaising with senior managers and the communications manager to prepare a press release if necessary, as part of the Crisis Communications Plan
- Holding all records and information regarding safeguarding concerns per relevant Data Protection laws
- Ensuring a timely resolution of the concern raised and, in any event, no later than three weeks from the date the report was made, unless there were good reasons for a delay
- Ensuring that all relevant records are kept on the case. A confidential register of safeguarding concerns reported must be kept by the Safeguarding Officer(s), which clearly outlines all actions taken by them,

the Organisation, and any communication with external agencies

- It is also important that while responding to an allegation, attention must be paid to the emotional impact the allegation may have on the alleged complainant, the alleged perpetrator, other staff members or representatives. All parties should be supported appropriately and provided access to counselling services.

## 2.5 Internal Investigations

- If the initial clarification process indicates an investigation is required, the Safeguarding Officer will appoint an Investigation Manager or take on the role of an Investigation Manager.
- The Investigation Manager will identify and appoint an investigation team (usually a team of 2 or 3 i.e., 1 independent lead investigator and 1 co-investigator) subject to national laws or policies in that jurisdiction.
- The Investigation Team will be convened to carry out an investigation based on the initial Incident Report and investigate breaches to the Safeguarding Code of Conduct and other organisational or corporate policies. The Investigation Team will produce an Investigation Report which may determine the next course of action for the Organisation.
- If the alleged incident involves a paid staff member that individual may be suspended with full pay pending completion of the investigation, again subject to the Organisation's HR policy, national law and/or policy.
- All investigations must be completed in a timely and fair way to avoid delay and unnecessary distress. Even if the person(s) involved resigns or leaves during this time, the full investigation must be concluded. NP will record the conclusion of the investigation results in the person(s) involved personnel files.
- If a criminal investigation is carried out by law enforcement, the Organisation should not carry out a parallel investigation to avoid duplication of interviews and possible tainting of evidence. However, it should carry out a confidential review of its policies, procedures, and practice to ensure that such safeguarding incidents are prevented from arising again.

## 2.6 Outcomes of Internal Investigation

If the allegations are substantiated based on the investigation, immediate disciplinary action will take place based on the Organisation's HR Manual. This may include but not limited to:

- Disciplinary action which could include immediate dismissal
- Repatriation to the country of origin at employee cost
- Suspension or termination of partnership, relationship, engagement, or contractual agreement with implementing partners
- Withdrawal of funding/support

Those involved will be notified of the outcome of the investigation within 14 days of the investigation's conclusion. Any concerns raised and next steps taken will be recorded by the Safeguarding Officer in the Register of Safeguarding Incidents, as will any outcomes of the investigations, subsequent actions, and learning.

### 3. Safeguarding of Children and Vulnerable Adults in Programmes

- All Safeguarding Focal Persons (FP) who are based within projects in-country are to map and compile a list of recommended local agencies that deal with protection issues where complainants can be referred. These may include local law enforcement, social services, emergency medical helplines, sexual and reproductive health clinics, counsellors, psychologists, and paediatricians. This list of agencies should be part of all programme plans and displayed together with the contact details of the project-level FPs. It should be updated regularly to ensure that details stay current.
- A simplified flowchart on reporting suspected abuse is to be displayed at the Organisation project offices in-country. It must include how to report concerns raised by staff, representatives, partners, beneficiaries and/or community members (refer to [Appendix H](#)).
- Accountability to children, vulnerable people, and communities, in which the Organisation works in is an essential component of this Policy and good programming. The Organisation will provide accessible and context-specific ways, in which children and vulnerable people can raise concerns or complaints. This includes:
  - Involving children and vulnerable adults in the design of these mechanisms to make sure they are appropriate to age, gender, and local culture, as well as being accessible.
  - Informing children and families in a context-specific way the requirements of this Safeguarding Policy and expected behaviour of staff and representatives under the Code of Conduct.
  - Providing the work-related contact details of Safeguarding Focal Persons to whom concerns can be raised, the Safeguarding Officers in Head office and access to the Designated Safeguarding Board member.
  - Provision of complaint boxes, confidential sessions, hotlines, confidential email addresses and safe areas for children and vulnerable adults to access.

### 4. Marketing, Communications and Fundraising

The Organisation has a duty of care to the people and communities it works with and always must put their interests first. Any depiction of children or vulnerable adults, in words or images, must protect their identity, preserve their dignity, and be accurate, balanced, and fair. The following is a guideline on how to safeguard children and vulnerable adults from risk of harm:

- 1) Written informed consent—before photographs of children or vulnerable adults are taken and images used for publicity, fundraising or marketing purposes, informed consent must be obtained and documented on a Consent Form. In the case of children under 14 years of age, permission from their parent or guardian must be obtained. For those between the ages of 14 and below the age of 18, their consent, as well as those of their parents/guardians, should be obtained. Signed informed consent forms should subsequently be filed in a secure location with the Communications Department only to be accessed by them (refer to Consent Form in [Appendix I](#)).

- 2) Portrayals of children and vulnerable adults must be accurate and balanced, with an emphasis on preserving their dignity. They should not be portrayed as passive complainants.
- 3) The names of children should always be anonymised. The names of vulnerable adults should also be anonymised to protect their identity unless they have explicitly stated a preference to be identified and indicated this on the signed consent form. The matter should be risk assessed by the communications lead within the Organisation while exercising its duty of care with advice from the Safeguarding Lead.
- 4) No personal information that could put a child or vulnerable adult at risk of harm should be posted on the Organisation's website or published in public-facing literature.
- 5) Children and vulnerable adults should always be appropriately clothed (no partial or full nudity), and photos should not be sexually provocative.
- 6) Third parties requesting the use of visuals or other materials belonging to the Organisation should be required to agree to safeguarding conditions regarding the proper use of the materials. Wherever possible images should be accompanied by captions that are relevant to the image.
- 7) Any media personnel, journalist or photographer gaining access to children and vulnerable adults at projects supported by the Organisation must be fully briefed by a Safeguarding Focal Point before the trip, provide clear police check and sign this Policy and Code of Conduct before the trip.

## 5. Policy Implementation and Quality Assurance

- 1) The Safeguarding Policy will be reviewed every two years and updated incorporating any changes to the evolving context, donor requirements, Swiss, local, or international legislation or guidance and international standards, or recommendations from lessons learnt. Procedures can be updated more frequently to ensure high standards in practice.
- 2) The Safeguarding Officer(s) and Human Resources will maintain secure records on the number of allegations against any member of staff or representatives, along with the outcome of any investigations into their conduct in the Safeguarding Register. HR will also maintain records of all the staff and representatives who have attended training on safeguarding.
- 3) The Organisation will have one or two Safeguarding Officers at the senior leadership level and a minimum of one in-country Safeguarding Focal Person. These staff members will have received training in organizational safeguarding and are responsible for implementation, monitoring, recording, and review of this Safeguarding Policy. They will support and supervise in-country Safeguarding Focal Persons. See [Appendix J](#) for Job Descriptions of Safeguarding Personnel.
- 4) At the Board level, the Organisation will designate a Safeguarding and Accountability Board Committee that who will oversee safeguarding matters and will regularly inform the Board. Safeguarding will be a mandatory and regular agenda item for the Board. An analysis of lessons learnt

and recommendations arising will be incorporated back into policy, procedures, and practice to prevent any further abuse and exploitation of children and vulnerable adults.

- 5) NP's commitment to Safeguarding is to be included and discussed in team meetings (within confidential guidelines), one-on-one supervisory discussions, and performance appraisals.
- 6) Safeguarding should be incorporated into regular internal and external programme and organizational evaluations and assessments.

## Appendix A – General Definitions of Abuse, Exploitation and Neglect

1. **Abuse, Exploitation and Neglect:** All forms of actions or inaction that result in harm (or risk of harm), injury, or death of children or a vulnerable adult by another in a position of responsibility, trust, authority, or power.
2. **Physical Abuse** results in actual or potential physical harm from an interaction or lack of interaction. There may be single or repeated incidents. Examples include smacking, hitting, shaking, poisoning, burning, drowning, or suffocating, or deliberately making a someone ill.
3. **Sexual Abuse** is the involvement of a child or vulnerable adult in sexual activity that he or she does not fully comprehend, is unable to give informed consent to, or for which the child or vulnerable adult is not developmentally prepared and cannot give consent, or that violates the laws or social taboos of society. The activity is intended to gratify the needs of the perpetrator. It includes being touched inappropriately; being forced to look at sexual pictures or videos; being forced to watch someone do something sexual; being forced to make sexually explicit pictures or videos and have them shared through technology; made to do something sexual to someone that may feel uncomfortable or wrong. Perpetrators may sexually groom children or vulnerable adults by enlisting the trust of caregivers to enable easy access to the child or vulnerable adult.
4. **Emotional Abuse** includes the failure to provide a developmentally appropriate, supportive environment, including the availability of a primary attachment figure so that the child or vulnerable adult can develop a stable and full range of emotional and social competencies. Acts of emotional abuse may include restriction of movement, patterns of belittling, denigrating, scapegoating, threatening, scaring, discriminating, ridiculing, or other non-physical forms of hostile or rejecting treatment.
5. **Sexual or Commercial Exploitation** includes using children or vulnerable adults to work or perform other activities for the benefit of others where the perpetrator profits monetarily, socially, politically, or in other ways where there is an exchange of gifts, cash, or in kind. This includes, but is not limited to, child labour, forced recruitment into armed groups, prostitution, trafficking, and pornography. These activities will risk the physical or mental health, education (e.g., depriving them of schooling or

combining school with long hours at work in the case of children), moral, or social-emotional development (e.g., early or forced marriage).

6. **Neglect or Negligent Treatment** is the inattention or omission on the part of the caregiver to provide for the development of the child or vulnerable adult in all spheres such as health, education, emotional development, nutrition, shelter, and safe living conditions. This includes the failure to properly protect children and vulnerable adults from harm as much as is feasible.
7. **Traditional Harmful Practices** are practices based on cultural beliefs and values that have harmful consequences to children or vulnerable adults (e.g., early or forced marriage, female genital mutilation).
8. **Spiritual Abuse** using text from spiritual books or quoting scripture as an excuse to perpetrate abuse and violence or to instil fear in children and vulnerable adults.
9. **Modern Slavery** includes the crimes of human trafficking, slavery, and slavery-like practices such as servitude, forced labour, forced and/or early marriage, the sale and exploitation of children and vulnerable adults, and debt bondage.<sup>4</sup>
10. **Financial and Material Abuse** includes theft, fraud, exploitation, and pressure in connection to wills, property, inheritance, and financial transactions, or inciting a child or vulnerable adult to do any of these things on another individual's behalf; it may also involve the misuse or misappropriation of property, possessions, and benefits belonging to children or vulnerable adults.
11. **Domestic Abuse or Intimate Partner Violence** is any incident or pattern of incidents of controlling, coercive, or threatening behaviour, violence, or abuse of adults, by intimate partners, previous intimate partners, or family members regardless of gender or sexuality.<sup>5</sup>
12. **Bullying** is behaviour directed either against an individual or a group of individuals that creates a threatening or intimidating environment undermining the confidence and self-esteem of the recipient(s). It could be body-shaming and/or an abuse or misuse of power that humiliates or injures the recipient(s).
13. **Harassment** means unwelcome verbal, non-verbal or physical conduct, that is related to a person's characteristics, whether they are actual or perceived, which include: age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation
14. **Sexual harassment** - Any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another. Sexual harassment is particularly serious when it interferes with work, is made a condition of employment, or creates an

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<sup>4</sup> Refer to UK's Modern Slavery Act, 2015 <http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>

<sup>5</sup> Home Office Guidance: Domestic Violence and Abuse

intimidating, hostile or offensive environment. Sexual harassment may be unintentional and may occur outside the workplace and/or outside working hours. While typically involving a pattern of behaviour, it can take the form of a single incident. Sexual harassment may occur between or amongst persons of the opposite or same sex.

**15. Any Misuse of Power**, authority, or position concerning a child or vulnerable adult not covered above.

**16. Survivor/Complainant** - The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience, and the capacity to survive, however, it is the individual's choice how they wish to identify themselves.

## Appendix B – Safeguarding Policy Code of Conduct

This Code of Conduct (CoC) which applies always is consistent with the Inter-agency Standing Committee (IASC) Task Force on Protection from Sexual Exploitation and Abuse<sup>6</sup> and covers the prevention and protection of children and vulnerable adults from all forms of abuse, particularly sexual exploitation and abuse based on the following principles:

1. Sexual exploitation and abuse by the Organisation's staff or representatives constitute acts of gross misconduct and are therefore grounds for termination of employment;
2. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief in the age of a child is not a defence;
3. Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading, or exploitative behaviour is prohibited. This includes the exchange of assistance that is due to participants;
4. Sexual or intimate relationships between staff or representatives and those receiving a benefit from the NP programme are prohibited, as they are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of development work;
5. Consensual intimate or personal relationships between members of staff or volunteers are not prohibited but must be disclosed to the HR Manager. To prevent potential abuse of power or perceived or real conflict of interest, managers and supervisors should recognise that such relationships are not appropriate where one person manages, reviews, or takes administrative decisions concerning the other person, is subordinate to the other person in the same line of reporting/authority, or is in a position in which some other conflict of interest may arise.
  - a. Such relationships may, among others, have negative repercussions on the morale of the work environment and lead to allegations of favouritism. They may also lead to complaints of sexual harassment if the relationship sours and the subordinate person alleges that they were coerced into the relationship.
  - b. The parties to any such relationship must disclose in writing to the Human Resources Manager and may consult the Safeguarding and Accountability Committee for advice. Both parties will confirm they are aware of the organisation's safeguarding, sexual harassment, and discrimination

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<sup>6</sup> <https://interagencystandingcommittee.org/inter-agency-standing-committee/iasc-six-core-principles-relating-sexual-exploitation-and-abuse>  
(Amended in Sept 2019)

policies.

- c. The failure of a manager or supervisor to address any known or reasonably suspected act of prohibited conduct may result in the imposition of appropriate administrative or disciplinary measures on the manager or supervisor.
6. Where a member of staff or representative develops serious concerns or suspicions regarding sexual abuse, exploitation, or harassment by a fellow worker, whether in the same organisation or not, s/he must report such concerns via established reporting mechanisms; and
  7. Staff and representatives are obliged to create and maintain an environment that prevents sexual exploitation and abuse and promotes the implementation of this Code of Conduct. Managers at all levels have responsibilities to support and develop systems that maintain this environment.

It is a mandatory requirement that all the Organisation's staff (paid or unpaid), and students, interpreters, volunteers, ambassadors, consultants, visitors, contractors, advisors, directors, trustees, donors/funders, and partners (referred to as "staff and representatives") always abide by the Safeguarding Policy and Code of Conduct.

Any form of unacceptable behaviour towards children and vulnerable adults, particularly those who benefit from the Organisation's services or support, will constitute a breach to this Code of Conduct and will be considered gross misconduct. All concerns must be reported to the Organisation's Safeguarding Officer(s) or Safeguarding Focal Persons so that concerns are responded to appropriately and swiftly, including carrying out an investigation and taking follow-up action. In all circumstances, the best interest of the complainant/survivor will be of paramount consideration when decisions are taken.

Staff and representatives who undertake activities must adhere to this Safeguarding Policy, Code of Conduct, and these procedures always and create a culture of openness, transparency, respect, and safety where managers have particular responsibilities.

### **Recruitment and Onboarding**

- You must disclose any criminal record, caution, reprimand, warning or other relevant information on the self-disclosure form, whether received before or during the course of your work or association with the Organisation, as well as changes in circumstances. This requirement is in addition to any other published requirement for disclosure as part of your work or association with the Organisation or a former organisation or agency you may be (or have been) attached to.
- You must attend mandatory safeguarding training within the first two weeks of beginning your relationship with the Organisation in whatever capacity and must attend mandatory safeguarding training annually thereafter.

### **Risk assessments**

- The Organisation must undertake a risk assessment before carrying out any project involving children and vulnerable adults and must provide a safe and conducive environment for all activities.
- You must be aware and recognize power imbalance between yourself and other members of staff, representatives, and beneficiaries therefore authority must be exercised in an accountable and transparent way.
- You must always wear appropriate identification (with photo) when having direct contact with children and vulnerable adults.

## Report

- You must report any incidents or concerns that cause you to believe that a child or vulnerable adult is, or is likely to be, at risk of harm, abuse, or exploitation.

## When in direct or indirect contact with Children and Vulnerable Adults

- Treat all children and people with respect and never discriminate against or favour any person because of his/her age, gender, status, class, caste, nationality, ethnic or social origin, faith, visual appearance, language ability, sexual orientation or any factor that distinguishes him/her from others.
- Balance the need to respect societal norms of the communities with the responsibility to report abusive cultural practices.
- Work in partnership with colleagues and other agencies to promote and safeguard the welfare of children, vulnerable adults, and people in everything that we do.
- Ensure that, whenever possible, there is more than one adult present during activities with children and vulnerable adults, or they are at least within sight or hearing of others – unless the reason for this has been firmly established and agreed with a manager overseeing the Organisation's activities.
- Develop and keep clear personal boundaries and rules when conducting activities that involve children or vulnerable adults, to keep both them and you safe.
- Ensure that all the Organisation's staff and representatives have received appropriate supervision and support to ensure children and vulnerable adults are always safe.
- Ensure that confidential information concerning children, families, and communities is not shared inappropriately on social media, or with others, except through formal safeguarding reporting processes with full informed consent.

**Staff and representatives of the Organisation should not behave in an abusive or exploitative manner by exerting power and authority over children or vulnerable adults or by creating an unsafe environment. This includes:**

## Never engage in any sexual activity with children or vulnerable adults

- You must never engage in any sexual activity with children (persons under the age of 18) or vulnerable adults. Mistaken belief in the age of a child is not a defence.
- You must never engage in or attempt to engage in sexual or inappropriate relationships with children or vulnerable adults for whatever reason, including the use of suggestive conversations, comments, texting, instant messaging, emails, or via social media platforms, as there is an inherently unequal power dynamic. This includes possessing or distributing indecent images of children, vulnerable adults, or others.
- You must never use your status or position to form inappropriate relationships with any child or vulnerable adult, either face-to-face or online, which are of a sexual or exploitative nature, or which may become so.
- You must never communicate with children via social media, emails, or phone unless it is as an agreed part of your work and managers are both informed and able to monitor activity.
- You must never exchange money, job, goods, services, incentives, or aid for sexual favours or subject anyone to any other kind of humiliating, degrading, suggestive, or abusive behaviour.

#### **Never engage in any other exploitative behaviour**

- You must never engage or pay a child or vulnerable adult for any service that is not part of an organized and agreed activity.
- You must never use your status or position to intimidate, bully, threaten, discriminate against, embarrass, shame, humiliate, coerce, or undermine children or vulnerable adults.
- You must never encourage or assist children or vulnerable adults to break the law in any way.
- You must never engage in any commercially exploitative activities with children or vulnerable adults, including child labour or trafficking.

#### **Never engage in other abusive or negligent behaviour**

- You must never carry out your duties or visit with children and vulnerable adults while under the influence of alcohol, solvents, or drugs. This also includes not smoking in the presence of children during the research of other activities.
- You must never use any sort of physical chastisement/punishment or implements to beat or hit a child or vulnerable adult as a form of discipline or withhold food, water, or other necessities of care.
- You must never take any bribes or rewards to cover up or ignore suspicious activity involving children or vulnerable adults.
- You must never neglect a child or leave a child unsupervised that may put the child at risk of harm or injury.
- You must never carry out harmful traditional practices, such as the early or forced marriage of a child or vulnerable adult.



**A Commitment made by Staff, Representative, or Partner**

I have read and understood my responsibilities outlined in this Safeguarding Policy, Code of Conduct, and these procedures. I agree with the terms contained herein and accept the importance of complying with these provisions while working with or representing the Organisation and its partners in any way. I understand that the consequences for non-compliance could have serious repercussions, including disciplinary action, suspension and/or immediate dismissal. I also understand that the Organisation will need to report concerns to donors, other organisations, professional bodies, and/or the police. If any of my personal circumstances change that might affect my ability to undertake my duties within the Organisation and that may create a possible risk to children, vulnerable adults, or others, I undertake to inform the Organisation’s Safeguarding Officer immediately and seek his/her guidance.

**Name:** \_\_\_\_\_ **Date:** \_\_\_\_\_  
Job title/role/position: \_\_\_\_\_  
Affiliation/Organization: \_\_\_\_\_  
Address: \_\_\_\_\_  
Signature: \_\_\_\_\_

**Witnessed by (name):** \_\_\_\_\_  
Job-title (from HR Department or Safeguarding Officer) \_\_\_\_\_  
Address \_\_\_\_\_