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| Safeguarding Policy (Template) | |
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| **Protection from Sexual Exploitation, Abuse and Harassment (SEAH)** | |
| *Name of Project* | |
| Date: | |
|  | |

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# Introduction

[Project/organisation name] are committed to striving towards a world free from sexual exploitation, abuse and harassment (SEAH). We operate a zero tolerance to inaction policy – this means that not only are all acts of SEAH not tolerated but that all allegations of SEAH will be taken seriously. There is zero tolerance to inaction to prevent, report or respond to SEAH; and zero tolerance for retaliation against victim-survivors or whistleblowers[[1]](#footnote-2).

**N.B. Violation of the Safeguarding Protection from Sexual Exploitation Abuse and Harassment (PSEAH) policy or related policies will result in disciplinary action up to and including termination of employment or contractual obligations.**

[Project name] is [description of project *or organisation*] This policy has been adapted for this project as part of our ongoing commitment to Do No Harm and ensure that all stakeholders are aware of their rights and responsibilities. The policy sets out the standards of behaviour expected of all stakeholders, staff and representatives; sets out the procedures to describe how this policy is implemented throughout [Project/organisation name] and guidelines for how allegations of SEAH can be reported/will be handled.

|  |  |
| --- | --- |
| Policy Title | Safeguarding and/or Protection from Sexual Exploitation, Abuse and Harassment (PSEAH) (delete as appropriate) |
| Owner | [Organisational Department or Project Name] |
| Author/Editor | Name / Title [e.g. Project SG Lead] |
| Revision Date/Next Revision Due | Eg. 20 September 2024 / 20 September 2026 |

## Version Management

*{Include as much detail as you like in the version management in accordance with your organisation's policies and procedures. The chart above details the minimum requirement.}*

## Principles

### What do we mean by ‘Safeguarding’?

The term safeguarding is a broad concept of preventing harm to people and the environment. For the purposes of this policy, we define the term safeguarding to preventing harm to people by protecting children and adults from sexual exploitation, abuse and harassment (PSEAH). See glossary for definitions.

In the context of safeguarding as it relates to PSEAH, we use safeguarding to include the actions that a programme or organisation takes to prevent and respond to incidents of SEAH. This may include risk assessment and mitigations, appropriate recruitment processes, community sensitisation activities, the incorporation of safeguarding monitoring through monitoring, evaluation and learning (MEL) systems and all other activity that aims to prevent and respond to SEAH.

### Guiding Principles

[Project/organisation name] is committed to protecting people, particularly children, vulnerable adults, communities, and beneficiaries of project assistance, from any harm that may be caused from their association with [Project/organisation name]. This includes harm arising from:

• The conduct of employees or sub-contractors contracted by [Project/organisation name]; and

• The design and implementation of [Project/organisation name]’s projects and activities.

[Project/organisation name] believes that everyone we come into contact with, regardless of age, gender identity, disability, sexual orientation or ethnic origin has the right to be protected from all forms of harm, abuse, neglect and exploitation. [Project/organisation name] will not tolerate abuse and exploitation by employees, sub-contractors or stakeholders.

[Project/organisation name] commits to addressing safeguarding throughout its work, through the three pillars of **prevention, reporting** and **response.**

[Project/organisation name] has endorsed the Common Approach to PSEAH and strives to uphold the principles therein; namely:

**1.** **SEAH is prohibited.** Sexual exploitation and abuse (SEA) constitute gross misconduct and grounds for termination of contract, and potential prosecution under criminal, civil or military law. Sexual Harassment (SH) is misconduct and can constitute gross misconduct depending on its severity. Acts of SEAH are an abuse of power and undermine the integrity and impact of Humanitarian, Development, and Peacekeeping (HDP) work.

In particular:

a. Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions, is prohibited.

b. Exchange of money, employment, goods, or services for sex, including demands for sex / ‘sexual favours’ or other forms of abusive, humiliating, degrading or exploitative behaviour is prohibited. This includes exchange of any assistance or protection that is due to people or communities.

c. Any sexual relationship which involves improper use of rank, role or position, or any abuse of power and power imbalances, is prohibited.

d. Sexual activity with children (persons under the age of 18) by those engaged in HDP work is prohibited, regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defence.

e. Sexual harassment of co-workers (whether in the same organisation or not) or people in communities receiving assistance or protection, is prohibited.

**2. Zero tolerance for inaction.** This means: zero tolerance for acts of SEAH; zero tolerance for inaction to prevent, report or respond to SEAH; and zero tolerance for retaliation against victim-survivors or whistleblowers. It does not mean having zero cases of SEAH being reported. Reporting is strongly encouraged and should not be penalised.

**3. Tailor PSEAH approaches to the context and ensure the approaches are inclusive and victim-survivor centred.** Consult people and communities, particularly vulnerable groups. Build on and strengthen existing community and national mechanisms when assessing SEAH risk and designing PSEAH approaches. Embed and prioritise the rights, safety, needs, wellbeing and dignity of victim-survivors and their communities.

**4. Embed SEAH prevention as part of working culture.** Always act with integrity and help create and maintain an environment which prevents, reports and responds to SEAH. Leaders and managers at all levels have particular responsibility to resource, develop, implement and support PSEAH systems to proactively identify, monitor and address SEAH risks and reports.

**5. Respond appropriately to suspicions, reports and incidents of SEAH.**

In particular:

a. Knowledge, concerns or suspicions of SEAH by HDP personnel, whether in the same organisation or not, must be reported in line with organisational policies, guidance and reporting mechanisms.

b. Assistance and investigations should prioritise the rights, safety, needs, wellbeing and dignity of victim-survivors. Help victim-survivors who report an incident to access support, regardless of whether they participate in an investigation.

c. Hold those found to have committed SEAH accountable and take appropriate action in line with relevant due process.

**6. Respect confidentiality and protect against retaliation.** Ensure reports can be made safely and confidentially. All those involved in an allegation should be protected against retaliation, have their confidentiality and dignity respected and receive appropriate support. This includes victim-survivors, complainants, witnesses, whistle-blowers, and the subject(s) of complaint.

## Scope

The policy lays out the commitments made by [Project/organisation name]and informs employees and stakeholders of their responsibilities in relation to safeguarding. For the purposes of this policy stakeholders include any staff, representatives, volunteers, partners or partner staff and volunteers, trustees, journalist, celebrities or any other person acting on behalf of or representing [Project/organisation name] in any capacity, paid or unpaid.

This policy does not cover:

* Sexual harassment in the workplace between colleagues.
* Safeguarding concerns in the wider community not perpetrated by [Project/organisation name] stakeholders.

## Implementation

All staff working for [Project/Organisation] will be provided with a copy of this policy upon recruitment. Staff will need to read and clarify any questions regarding this policy before signing an acknowledgement and agreement to abide by this policy *{for example text see Annex A}*. Failure to abide by the Safeguarding/PSEAH policy will result in disciplinary action up to and including dismissal or termination of contract.

To support the adherence of this policy staff/partner organisation/trustee/stakeholder (delete or add as appropriate) must:

1. 1. Undertake training relating to PSEAH (*specify training here*).
2. 2. Sign the declaration to abide by the Safeguarding/PSEAH policy.
3. 3. Undergo appropriate background check including (*specify checks here – for example Misconduct Disclosure Scheme, Disclosure and Barring Service scheme, local police checks, etc*). These checks will be repeated (*specify time here or can be generalised by saying ‘as deemed appropriate by project/organisation’*).
4. 4. Management will provide reminders of the policy as well as the complaints and feedback response mechanism regularly to staff and stakeholders.
5. 5. Safeguarding and PSEAH adherence will be attached to performance evaluations.

6. {*Include other activities that will contribute to prevention of SEAH in your project or organisation. See CAPSEAH Practical Guidance for detailed actions*}

# Responsibilities and Prohibitions

Safeguarding and protecting all people from sexual exploitation, abuse and harassment is the responsibility of all staff and stakeholders. The following responsibilities and prohibitions provide guidance on actions that violate our commitment to Do No Harm and PSEAH. If you have questions or need clarification, please contact your HR representative.

## Responsibilities[[2]](#footnote-3)

### [Organisation/Project] will:

* Ensure staff have access to, be familiar with, and know their responsibilities within this policy.
* Design and undertake all programmes and activities in a way that protects people from any risk of harm that may arise from their coming into contact with [Project/organisation name]. This includes the way in which information about individuals in our programmes is gathered and communicated.
* Implement stringent safeguarding procedures when recruiting, managing and deploying staff and associated personnel.
* Ensure staff receive training on safeguarding at a level commensurate with their role in the organisation.
* Follow up on reports of safeguarding concerns promptly and according to due process.
* Ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and the communities we work with.
* Ensure any staff reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected by [Project/organisation name]’s Whistleblowing) Policy.

### Staff and associated personnel must not:

* Engage in sexual activity with anyone under the age of 18.
* Sexually abuse or exploit children.
* Subject a child to physical, emotional or psychological abuse, or neglect.
* Engage in any commercially exploitative activities with children including child labour or trafficking.
* Staff are prohibited from engaging in any activities related to the production, distribution, viewing, downloading, or profiting from sexually explicit content involving children.
* Sexually abuse or exploit at risk adults.
* Subject an at risk adult to physical, emotional or psychological abuse, or neglect.
* Exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance.
* Engage in any sexual relationships with beneficiaries of assistance, since they are based on inherently unequal power dynamics.

**N.B. All staff are obligated under this policy to report concerns promptly to the appropriate channel; maintaining a high level of confidentiality and professionalism.**

# Reporting Concerns

Raising a safeguarding concern is often a difficult process, whether the person raising the concern is a victim-survivor or connected to the concern in another way such as witness, etc. Please be assured that every concern raised to [Project/organisation name] is taken seriously and will be followed up following a survivor-centred approach (*see 3.3 Victim-Survivor Centred Approach*).

Staff members who have a complaint or concern relating to safeguarding should report it immediately to their Safeguarding Focal Point [as appropriate] or line manager. If the staff member does not feel comfortable reporting to their Safeguarding Focal Point or line manager (for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they may report to any other appropriate staff member. For example, this could be a senior manager or a member of the HR Team.

[Project/organisation name] will follow up safeguarding reports and concerns according to policy and procedure, and legal and statutory obligations (*see Annex B Procedures for reporting and response to safeguarding concerns*).

[Project/organisation name] will apply appropriate disciplinary measures to staff found in breach of policy up to and including dismissal or revocation of contractual obligations.

[Project/organisation name] will offer support to survivors of harm caused by staff or associated personnel, regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding support will be led by the survivor and tailored on a case-by-case basis.

It is essential that confidentiality in maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need to know basis only, and should be kept secure at all times.

## What to report

In making the report, it would be helpful to include as much information as possible. This includes the nature of the complaint, date and time of the incident, who was involved, if there is any concern for the safety of someone, in particular, a minor, and whether another entity has received this complaint too. Your name and email address is optional to allow for anonymous reporting. Please note that including contact details makes it possible to follow up any reports[[3]](#footnote-4).

Try to give as many facts as you can. Think of:

**Who** was involved?

**What** happened?

**Were** there any witnesses?

**Was** medical attention needed or sought?

**When** did this happen? If you do not have a specific date and time, give an approximation.

**Where** did the incident/s take place?

You may not have all of the details but providing as much information as possible will help the investigation process. **Staff should never investigate the issue themselves, but instead must report through the appropriate channel as soon as the issue comes to their attention. Confidentiality must be maintained at all times to protect the parties involved.**

## Reporting Channels

***Examples of reporting channels – adapt to your organisation and project. It is essential to include this information in an easy to access format so that anyone wanting to file a concern can find the information needed quickly.***

***Email: safeguarding@my-project-organsiation.example***

***Online Web portal: https://reportharmfulcontent.com/***

***Telephone: +44 (0)1355 843 747 FCDO Reporting Concerns***

***Postal address: FAO Safeguarding Dept, Office Street, City, Post Code, Country***

***Safeguarding Lead/Focal Point: abpe@niras.com***

***Project Lead: projectlead@myorganisation.ex***

***Donor reporting channel:*** [***ODA.Safeguarding@defra.gov.uk***](mailto:ODA.Safeguarding@defra.gov.uk)

## Victim-Survivor Centred Approach

[Project/organisation name] adopts a Victim-Survivor Centred Approach in handling reports of SEAH. The following information has been adapted from the Inter-Agency Standing Committee (IASC) Survivor-Centre Approach[[4]](#footnote-5)

The IASC defines the survivor centred approach as prioritising the survivor’s rights, needs and wishes.’

Victim-Survivors have the right:   
   –   To be treated with dignity and respect.  
   –   To choose -choose how they participate in any investigation, how to report concerns, and what support services they accept.  
   –   To privacy and confidentiality.  
   –   To non-discrimination.   
   –   To information.

Using a survivor-centred approach means that you:  
   –   Validate the person’s experience.   
   –   Seek to empower the person.   
   –   Emphasize the person’s strengths.   
   –   Value the helping relationship.

* A survivor-centred approach puts the safety, wishes and interest of the survivor first, above all other considerations.
* Taking a survivor-centred approach requires that an organisation talks to and listens to the survivor in ways adapted to each and every single survivor.
* A survivor-centred approach indicates that the survivor’s wellbeing should be prioritised over and above other actions such as internal reporting requirements, protecting an organisation’s reputation, completing a fact-finding process or reporting a concern or incident to legal authorities.
* Where a survivor is a child the best interests of the child are also a part of taking a survivor-centred approach.

# Other Information

## Related Policies

Complementary Polices which should be reviewed alongside the Safeguarding and PSEAH Policy include:

Code of Conduct

Anti Bribery and Corruption

Whistleblowing Policy

Safety and Security Policy

Anti-Bullying and Harassment Policy

Modern Slavery Policy

Recruitment Policy

Grievance Policy

Staff Handbook

## Glossary

**Balance of probabilities** — refers to the common standard of proof in sexual exploitation, abuse and harassment administrative investigations, where more evidence supports the finding that the misconduct happened than otherwise.

**Best interests of the child** — primary consideration must be given to the child’s wellbeing in actions concerning a child due to the child’s dependency, maturity, legal status and often “voicelessness”, in balance with procedural fairness.

**Child/Children** — refers to person(s) under the age of 18.

**Concern/ Complaint** — refers to information provided, whether by a victim-survivor or any other person (source), indicating conduct that may be in breach of IDRC’s policies or procedures but that has yet to be assessed.

**Confidentiality** — refers to two aspects of a SEAH investigation. The first relates to the victim-survivor, who must be fully informed of all aspects of the investigation process and must provide their informed consent. The second relates to access and dissemination of information, where the investigation team should ensure that required information is available to authorised individuals on a strictly need-to-know basis.

**Do No Harm** — refers to the ethical guiding principle stipulating that organisations should refrain from doing any harm while making an effort to do good. It is concerned with minimising unintended, negative consequences when providing support or funding.

**Informed consent** — comprises of three components: comprehension, voluntariness, and stated permission. Victim-survivors should be provided with all information related to the investigation process, how the information will be used, the potential risks and benefits and have indicated they comprehend the information related to them (comprehension).

Victim-survivors should provide their consent voluntarily without influence or coercion from others, and can change their mind about participating in the investigation at any point.

**Safeguarding** — refers to the prevention and response to sexual exploitation, abuse or harassment, plus any broader forms of violence, exploitation and abuse.

SEAH/PSEAH – SEAH refers to sexual exploitation, abuse and harassment (see definitions below). PSEAH refers to Protection from SEAH and includes all the measures organisations take to prevent, to the extent this is possible, SEAH.

**Sexual exploitation** — refers to any actual or attempted abuse of a person in a position of vulnerability, differential power, or trust, for sexual purposes including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another. It includes, but is not limited to, transactional sex, solicitation of transactional sex and exploitative relationship.

**Sexual abuse** — refers to an actual or threatened physical intrusion of a sexual nature, whether by force, coercion or under unequal conditions. This would include forced marriage and sexual slavery and also includes sexual activity with a child (any person under the age of 18).

**Sexual harassment** — refers to any unwelcome conduct of a sexual nature, that may include, but are not limited to, sexual suggestions or demands, requests for sexual favours and sexual, verbal or physical conduct or gestures, that are or might reasonably be perceived as offensive or humiliating.

**Subject of Complaint** — refers to the person against whom the allegation, concern or suspicion has been raised.

**Substantiated** — refers to the conclusion of an investigation where there was sufficient evidence based on the “balance of probability” assessment, to establish the occurrence of a misconduct or SEAH incident.

**Victim/survivor-centred approach** — a victim/survivor-centred approach creates a supportive environment in which the victim-survivor’s rights and wishes are respected, their safety is ensured as far as possible, and they are treated with dignity and respect, in balance with procedural fairness.

**Unsubstantiated** — refers to the conclusion of an investigation where the available evidence was insufficient to allow for an investigation to be completed, or that there was insufficient evidence to establish the occurrence of misconduct for a variety of reasons. Such a conclusion does not mean the allegation was necessarily false.

**Victim/Survivor** — refers to a person who has experienced SEAH, including those who self-identify as a victim or survivor. An individual’s choice of how to identify (as a victim or survivor) will be respected.

**Zero tolerance approach to inaction** — refers to an approach of not allowing and accepting any form of violations, undesirable behaviours and acts of Sexual Exploitation, Abuse and Harassment (SEAH), and ensuring all allegations are treated seriously, investigated and where allegations are confirmed through investigation, disciplinary action is taken as a result, including dismissal.

1. Definition taken from CAPSEAH Common Principles. See [Common Principles](https://capseah.safeguardingsupporthub.org/common-approach#part2) [↑](#footnote-ref-2)
2. Adapted from [Bond Safeguarding Policy Template](https://www.bond.org.uk/resources/safeguarding-policy-templates/) [↑](#footnote-ref-3)
3. Adapted from [Safeguarding Support Hub: Report a concern](https://safeguardingsupporthub.org/form/report-a-concern) [↑](#footnote-ref-4)
4. See [IASC Definition & Principles of a Victim/Survivor Centred Approach](https://interagencystandingcommittee.org/sites/default/files/migrated/2023-06/IASC%20Definition%20%26%20Principles%20of%20a%20Victim_Survivor%20Centered%20Approach.pdf#:~:text=This%20guidance%20sets%20out%20a%20common%20definition%20of,and%20informal%20processes%2C%20policies%20and%20procedures%20in%20relatio) [↑](#footnote-ref-5)