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Safeguarding Policy and Procedures

SAFP



SAFP
SATHI ALL FOR PARTNERSHIPS

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ACRONYMS

CHM	Complaint Handling Mechanism
CBO	Community Based Organization
CP	Child Protection
DR	Director Administration
DRR	Disaster Relief and Rehabilitation
DPO	Disabled Peoples Organization
ED	Executive Director
ER	Emergency Relief
FRA	Forest Right Act
HR	Human Resource
NGO	Non-Government Organization
PESA	Panchayat (Extension to Scheduled Areas) Act 1996
POSCO	Protection of Children from Sexual Offences Act 2012
POSH	Prevention of Sexual Harassment Act 2013
PwD	Persons with Disabilities
M&E	Monitoring and Evaluation
SCST (PA)	Scheduled Castes and Scheduled Tribes (Prevention of Atrocities) Act 1989
RPWD	Rights of Persons with Disabilities
SPP	Safeguarding Policy and Practice
SAFP	Sathi All For Partnerships
SOP	Standard operating Procedures

Preface and acknowledgement

Safeguarding work in India has been done in bits and pieces by most organizations in India. This is so as legal frameworks have evolved at different stages of jurisprudence development. The most recent legislation has been prevention of sexual harassment at workplace. The protection of children from sexual offenses was enacted just a year before. Due to this safeguarding is confused with protection from sexual offenses. The reality is way beyond this understanding.

Safeguarding in organizations: (i) the Global and Indian legal and cultural context has changed very dramatically in the last few years in the arena of Safeguarding, (ii) we have introduced the third pillar of Healing and Closure in the Safeguarding system. Experience shows that the reporting, investigation and decision announcement by the Management or the Disciplinary Committee involves substantial time, energy and emotions of not just the Committee members and persons involved, but also of other staff and the organization as a whole. Most often it generates the development of a negative culture in the organization full of grudges and speculations. Also leads to high attrition rate of both the offender and the abused. It also leaves many issues unresolved and finally (iii) in our research we have not seen safeguarding children and adults as part of the core social development programming. Child protection programming is a small mechanism in the overall safeguarding policy. SAFFP therefore took the opportunity to present safeguarding in programming. The procedures for safeguarding in programming can be applied to any theme by embedding it in the program cycle. Theme specific safeguarding framework should be developed after conceptually understanding the difference between protection and safeguarding. This takes time which needs to be resourced and invested in HR and partnership development.

This safeguarding policy with each partner is a co creation by understanding aspects of safeguarding that helped SAFFP to understand the needs for developing the policy and procedures as collated in this document. Our team has researched a number of safeguarding policies and procedures developed in India and outside. All visuals and diagrams have been taken from the internet except where acknowledged as credited to SAFFP. These visuals are used to facilitate understanding issues for conceptual clarity. The draft document was field tested to create the final document. We thank SAFFP resource person Mr Amod Khanna for his input that this policy and the procedures, should remain fluid for the next three years. This is suggested as the process of owning the role of safeguarding is a very significant one to create a culture of acceptance towards the role of safeguarding.

With best wishes

Dr. Shivani Bhardwaj and Ms Deepika Nair

Sathi All For Partnerships (SAFFP)

Safeguarding Policy and Procedures

Section I: What is safeguarding?

1.1 Introduction

‘Safeguarding’ is an organizational and an individual responsibility. All Board members, staff, volunteers, SAFP representatives, visitors and vendors (both employed or otherwise and referred to collectively as ‘SAFP people’ in this policy) will be made familiar with the value and process of safeguarding children and vulnerable adults, beneficiaries and communities in operational area that we come into contact with, in all that SAFP does . Safeguarding also extends to SAFP people with special reference to safeguarding themselves and their colleagues at workplace including work in high risk areas and sensitive thematic concerns in different work contexts.

*SAFP serves the underprivileged sections of the society, hailing from socially excluded communities, the Scheduled Caste and Scheduled Tribes, and religious minorities by exercising preferential actions for the most marginalized. She is committed to protect and promote the dignity of children and young people therefore, SAFP takes their safeguarding very seriously. **Even staff and volunteers may also go through challenging circumstances exposing them to risks.** envisages to have well established safeguarding systems, structures, and operational mechanisms are embedded into existing policies to ensure that **SAFP does everything to safeguard the children and adults she works with, and that she provides a safe and secure working environment for everyone.***

What is Safeguarding?

Safeguarding simply put is to protect adults and children to be safe from harm or damage or abuse with appropriate measure to mitigate risks in any given context.

Several factors have driven the increased attention paid to safeguarding. With increasing exposure to unsafe behavior and situations, and unpredictable natural hazards; children and adults are put to risks of being harmed and neglected. Additionally, increased reporting of exploitation, abuse and accidents to workforce, collaborators, vendors and clients especially the last user in all businesses; from the local to international; has forced all stakeholders to relook and reexamine internal and external related policies in their ecosystem. This is especially so as countries have ratified International Conventions, treatise and legislations to be accountable to mitigate risks by people and institutions.

Scope of safeguarding policy and target group differs from organization to organization depending on their mission, scale and diversity of operations. Accordingly, the presentation and formatting of focus and mitigation too is different. The concept of safeguarding is applicable to all businesses whether they are into people, habitat, ecology or working with other entities, i.e. the state, corporates, media, advertising and PR, academia, non-profit organizations etc.

International

An over-arching safeguarding policy is required as a plethora of regulatory requirements, both within the country and abroad make organizations and their staffs, accountable where there is increased possibility that certain compliance requirements get missed. It also adds considerable cost to an organization's compliance budget and complexity to internal structures and information needs. Developing a strategy to lessen the restraining effects of compliance activities on the organization and its work is critical for its successful implementation.

Safeguarding Role

This safeguarding policy and procedures will cover entities, staff and other relevant people, vulnerable adults, children and reputation. These include:

- i. Staff employed on full time or short positions, consultants on contracts and volunteers.
- ii. Vendors, visitors
- iii. Partner organizations
- iv. Community especially children and vulnerable adults (in field area)
- v. Organisational image, use of assets and result based interventions

The organization then will build a culture of safeguarding for prevention, identification, reporting and redress



processes to keep children and vulnerable adults safe especially those at more risk of harm. The organization is cognizant of special circumstances or contexts of work that can put children and adults at risk such as work in DRR and ER; anti-trafficking and work in conflict areas with different kinds of risks and mitigation needs.

Diagram: Safeguarding culture

Safeguarding shapes the organization's approach, practice and culture to ensuring a comprehensively safe environment for all people that the organization engages with.

Purpose of the Safeguarding policy

This policy is to guide SAFFP people with a clear process to ensure:

Most of the Aid agencies like Plan International and Save the Children have scoped safeguarding to sexual abuse, harassment and exploitation with children and adults they come in contact with. Others like World Bank, OXFAM and DFID include safeguarding sustainability, natural resources, worker's rights, and exclusion of geographies, marginalized people, abilities, sexual orientation and age. Civil society groups have worked in different sectors to deal with discrimination in policies to make change at the level of procedure. For example, in Australia, the elderly can work till any age as the country has recognized age discrimination and worked on it actively.

- **Awareness to build safeguarding capabilities:** To live and work in a safe and protect children and vulnerable adults from all forms of harm, abuse, neglect and exploitation where possible, regardless of gender, age, ethnicity, disability, sexuality, sexual identity or beliefs.
- **Learning to report abuse to evolve behaviors:** Prevention, identification, reporting and redress processes for behavior change and/or disciplinary measure.
- **Monitoring the compliance to revive commitment to safeguard:** Ensuring that person designate for Safeguarding does safeguard SAFP r people including whistle blowers by operating within a clear framework and defined procedures.

The above requires safe recruitment and training to minimize the risk of abusers entering the organization and mechanism to maintain safety and security. The monitoring and reporting process helps SAFP people to grow in their safeguarding role.

- **Implications for the Partners**

A policy on safeguarding is non-negotiable. Each partner will comply with this policy to effectively implement the policy requirements in child protection, gender, inclusion, thematic concerns and financial regulations. Therefore, partners must have their own Safeguarding Policy that provides the same or a higher level of protection than this policy, in full compliance with local law and best practice or abide by SAFP India’s Safeguarding Policy for the duration of the partnership agreement/arrangement.

1.2 Scope and limitation of this policy

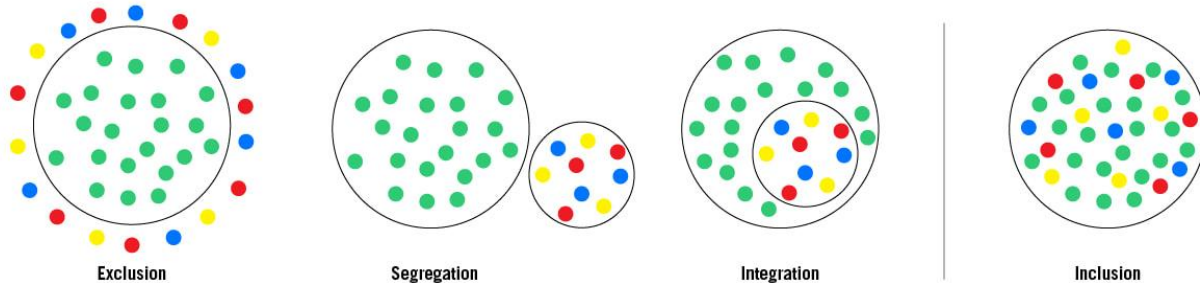
Scope

SAFP India takes responsibility to a practice that protects her image, her staff, partners, children and vulnerable adults they come in contact with from any harm. This safeguarding policy provides definitions and guidance on how to apply and implement this policy throughout the organization with suggested procedures, in relation to SAFP, its partner organizations and in the community in SAFP operational areas.

Safeguarding and protection measures are also implemented through other SAFP in-house policies and procedures. These policies need to be read along with this safeguarding policy as an umbrella framework. Every policy when breached in the safe guarding context will need to be revised to include safeguarding elements. For example, the protection of the whistle-blower finds mention only in the SAFP human resource policy while it should be mentioned in all policies. As an overarching safeguarding policy, this document will explain who the whistle blower is and what process they could follow. A separate whistle blower policy is drafted.

Limitation

This safeguarding policy limits itself to the communities SAFF and its partners work in. If any transgression is observed or brought to the notice of SAFF outside their operational area, SAFF and its partners will report to appropriate authorities.



1.3 Policy authority and designate

Currently, the policy authority is the SAFF management and the policy designate is the Human Resource Manager for the implementation of all in-house policies.



Everyone is entitled:

- To be treated with dignity, respect and courtesy.
- To a workplace free from bullying or harassment.
- To experience no form of discrimination.
- To be valued for their skills and abilities.

It is suggested that an internal 'Safeguarding Committee' be constituted for a period of two years, while the policy authority and the policy designate continues its role. This safeguarding committee will be responsible to revise all internal policies and guidelines for inclusion of appropriate safeguarding remit and procedures. This committee will also be responsible for overseeing the process of embedding safeguarding policy practice and monitor the change in behavior and program approach. To this end, contract a Safeguarding Officer dedicated to coordinate change in practice for a period of two years. S/He will report to the Steering committee.

Following the successful embedding process, the safeguarding remit will transfer on to the Human Resource Manager. A term of reference for the Safeguarding Committee is attached to this policy.

1.4 Safeguarding Policy Principles

This safeguarding policy underpins the social teachings of the Church and SAFF India's vision and mission as mentioned in the strategic plan (2019 to 2023). It focusses on the principle of Diakonia in all its strategic and operational considerations. Diakonia is the mission for establishing and safeguarding justice and dignity, as the guiding force

of the Strategic Plan. Thus, safeguarding as a duty is sacred. It will follow the path of truth to prevent harm and when any incident occurs after corrective action there is to be healing of both the victim and the perpetrator to reform and accept the repentance. Following are the safeguarding policy principles:

- a. Underpins justice and dignity principles
- b. Abides by the Values and Mission of SAFP
- c. Its compliance to the safeguarding policy is non-negotiable
- d. Is everyone's responsibility.

1.5 Legal backdrop

This safeguarding policy will be implemented within the relevant Indian legal framework. Given below is a list of relevant legislations for reference.

- a. National and global need; legislations and reporting; government safety standards; The Forest Rights Act, The SC/ST (Prevention of atrocities) Act 1989; (Panchayat) Extension to scheduled areas act 1996, POSCO Prevention of Sexual Harassment Act 2013, Juvenile Justice and Care Act, Child Protection Act and the new amendment; Child Labor Prohibition Act 1986, Migrant Workmen (regulation of employment and conditions of service 1979), Rights of Persons with Disabilities Act; Mental Health and Care Act, Anti-trafficking bill; Immoral Traffic (Prevention Act) 1956, Child Marriage Act.
- b. Reference to the various judgements; the CSR discourse; Workmen compensation etc.
- c. The emerging relevant draft bills in the making are – Draft Personal Data Protection bill 2018 of India; Compliance of the existing General Data Protection Regulation (GDPR) of the European Union; Trafficking of Persons bill 2018.

1. 6. Definitions

Manager

Manager refers to a Staff member who has responsibility for line managing or supervising the work of Staff or Partners or Associates.

Staff

Staff refers to individuals who receive a regular salary for work in SAFP.

Visitor

Visitors refers to a range of persons who are visiting our offices or programmes, and may come into contact with children and vulnerable adults through SAFP, including journalists, media, researchers, visiting sponsors and celebrities.

Child

In line with the United Nations Convention on the Rights of the Child and for the purposes of this policy, is defined as any person – girl, boy, young woman, young man, and children of other gender identities - under the age of 18 years (UNCRC Article 1)

Vulnerable adult

Vulnerable adult for SAFP is a person aged 18 or over, in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.’

This policy applies to all children and vulnerable adults with whom SAFP has contact regardless of gender, sexuality, religion or ethnicity. SAFP has in place other employment and organizational policies that complement the Safeguarding Policy and help ensure the safety of everyone.

Safeguarding

Safeguarding is the proactive steps taken to prevent violence including, all forms of physical or mental violence, injury and abuse, neglect or negligent action. It is about taking responsibility towards, the preventive, responsive and referral measures undertaken for protection, ensuring that no child or vulnerable adult is subject to any form of harm as a result of their association with SAFP This includes, ensuring that their contact with SAFP and those associated with SAFP and/or their participation in our activities, interventions and operations is safe and where there are concerns over a child or vulnerable person’s welfare or where a child or a vulnerable person has been subject to violence, appropriate and timely actions are taken to address this and incidents are analyzed so as to ensure continued learning and system strengthening for SAFP.

Gender Responsive Safeguarding ¹

This is a safeguarding approach that takes full account of gender in considering the specific safeguarding needs of girls, boys and other gender identities. This approach integrates safeguarding measures that address protection risks that stem from issues relating to gender bias and discrimination; and supports the empowerment and fosters the inclusion of girls, particularly in the safeguarding process, in a manner that promotes equality, equity and ultimately their increased safety and protection.

Child Protection

Child Protection is the response to concerns and/or disclosures that a child or a vulnerable adult may be experiencing, or be at risk of physical and/or mental violence, injury and/or abuse, neglect and/or negligent treatment, maltreatment and/or exploitation, and/or sexual assault.

Harm

Harm is any detrimental effect on a child’s or young person’s physical, psychological, or emotional wellbeing. Harm may be caused by abuse or exploitation whether intended or unintended.

¹ Plan India child and youth safeguarding policy 2018

Abuse ²

Abuse is a general term used about situations where the child or a vulnerable adult may experience harm, usually as the result of failure on the part of the parent or carer to ensure a reasonable standard of care and Safeguarding. Somebody may abuse or neglect a child by inflicting, or by failing to act to prevent, significant harm to the child. It is normally categorised into four main forms - physical, sexual and emotional abuse, and neglect. It is often the case that a child discovered to be suffering one form of abuse will also be experiencing others.

Children may be abused by those known to them or, more rarely, by a stranger. Child abuse takes place within the context of the family, or outside the family - for example, in institutions, at work (child labor), on the streets (street children), in war zones and emergencies. Recent cases also highlight the abuse of children by professionals or other adults who are employed in positions of trust where they care for or work with children. Abuse can take place in person and online, by other children and/or adults, including those in positions of trust.

Exploitation

Any actual or attempted abuse of a position of vulnerability, differential power or trust to profit monetarily, socially or politically. There are various types of exploitation including:

1. **Sexual Exploitation:** The actual or attempted abuse of 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.
2. **Trafficking:** The recruitment, transportation, transfer, harboring, or receipt of children or vulnerable adults for the purpose of exploitation such as for labor, prostitution and sexual exploitation.
3. **Child Labor:** Any economic activity performed by a person under the age of 15
4. **Survival Sex:** Occurs when a child or vulnerable adult living in poverty or in an emergency situation chooses to engage in or is coerced into sex as a last resort for survival. It is transactional sex in exchange for food, water, drugs, shelter, money and any other essential needs for integral human survival.

Harassment

Harassment can take many forms. It may be, but is not limited to, words, signs, offensive jokes, cartoons, pictures, posters, statements, pranks, intimidation, physical assaults or contact, or violence. Harassment is not necessarily sexual in nature. It may also take the form of other verbal activity including derogatory statements not directed to the targeted individual but taking place within their hearing. Other prohibited conduct includes taking retaliatory action against an employee for discussing or making a harassment complaint. It is also against SAFF policy to download inappropriate pictures or materials from computer systems

² Adapted from National Guidance for Child and Vulnerable Adults Safeguarding in Scotland, The Scottish Government 2010, Save the Children UK Child and Vulnerable Adults Safeguarding Policy and the Caritas Internationalis Child and Vulnerable Adults Safeguarding Policy Framework.

Sexual Harassment

Sexual harassment may include any form of unwanted verbal, non-verbal or physical conduct of a sexual nature with the purpose or effect of violating the dignity of a person in particular when it contributes to creating an intimidating, hostile, degrading, humiliating or offensive environment. It may include unwelcome sexual advances, requests for sexual favors, or other verbal or physical contact of a sexual nature. It is important to note that sexual harassment crosses age and gender boundaries.³

Safety and health of staff and SAFF people within a work context involves risk/hazard identification and mitigation according to government standards. This involves



ongoing safety training and education for staff to prevent, report and address abuse and harm caused by bullying, harassment, sexual misconduct, breach of dignity and exclusion as provided in the FRA, PESA and SCST Acts. Workplace safety regulated by Migrant Workers, Workmen Compensation and ESI ACT that compensate for injuries and illnesses occurring while at work.

Security at work is often considered by a person before joining an organization and this is gender neutral and ability sensitive.

It is the responsibility of the organization to provide safety at work and to secure working environment for not only its staff but for those who come in contact with its workforce. It is also important to conduct safety and security checks from time to time for further strengthening and improvement.

Suspect

An individual, who is suspected of having abused, exploited or knowingly allowed the ill treatment of a child or vulnerable adult. Such abuse or exploitation may cause physical, sexual, emotional, psychological or other harm to an individual. Investigation would determine whether the suspect is guilty or not.

Reporter/ Whistle blower

An individual who identifies and reports suspected incidents of abuse or exploitation of a child or vulnerable adult. All SAFF Staff are required to report whenever a suspicion of abuse or exploitation involving SAFF Staff or other humanitarian workers is raised, even when they may not have all the facts at hand.

³ Adapted from Caritas Internationalis child and vulnerable adult safeguarding policy framework

Section II: SAFP Safeguarding Policy

1. Policy statements

1.1 At the community level

- i. SAFP recognizes to safeguard the wellbeing, safety and protection of all people, be it children, adults, partners and other institutions it works with in different work spaces, work contexts and thematic concerns undertaken by SAFP or indirectly through a contracted agreement with another entity.
- ii. SAFP expects a strong emphasis on building awareness, developing capacities, monitoring mechanisms, compliance and reporting and closure.
- iii. SAFP strongly believes and is committed to safeguarding; hence, SAFP recognizes the need to develop and implement appropriate mechanisms for safety, protection, monitoring, reporting, redress and healing.
- iv. SAFP expects all partners to provide the at least the same, or a higher, level of protection for children and vulnerable adults provided for in this policy in accordance with applicable law, regulation and best practice.
- v. SAFP believes all children and adults without exception have the right to protection from abuse regardless of gender, age, caste, religion, place of birth, PL HIV status, ethnicity, disability, sexuality, sexual identity or beliefs.

1.2 At the level of SAFP people

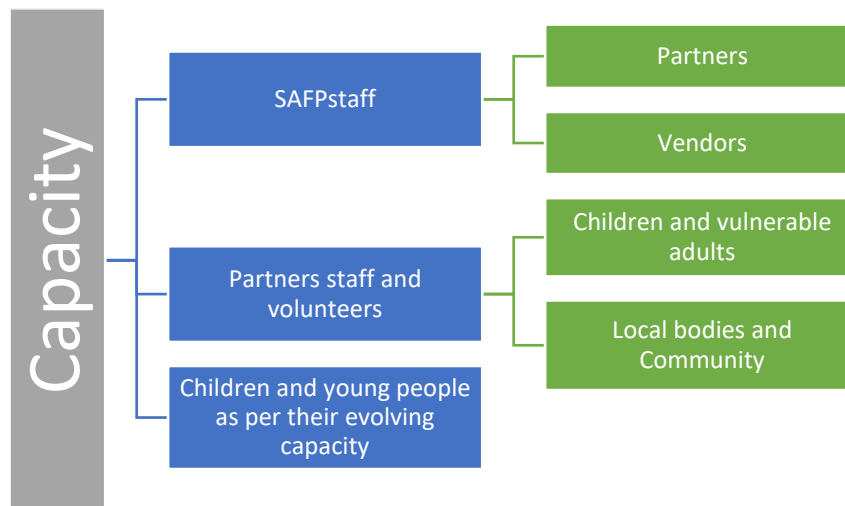
- i. SAFP recognizes its responsibility and commitment to promote and ensure security, safety and wellbeing of SAFP people in its offices/work spaces/locations and different work contexts.
- ii. SAFP strongly affirms that no individual or group will be treated less favorably than others at workplace/location and in the community.
- iii. SAFP people should ensure to protect the image of SAFP India, its resources, including data and assets, its workplace/building/location and its programs.
- iv. SAFP is committed to safeguard its colleagues from emotional trauma/burnout, false allegations by operating within clear and mutually understood frameworks.
- v. SAFP is committed to safeguard itself from wrong people entering and working in the organization.
- vi. SAFP recognizes the need to safeguard SAFP people from external troublemakers especially while working on sensitive themes/areas.
- vii. SAFP recognizes the need for capacity and appropriate mechanisms for awareness, safety, protection, monitoring, reporting, redress and healing. It will prescribe and ensure acceptable procedures and behaviors in the organization.

2. Putting Policy into Practice

2.1 Capacity for Safeguarding

- i. To begin, SAFFP commits to communicating this policy throughout the organization, its partners and other vendors; ensure a buy-in and commitment to fulfill their safeguarding obligations. The onus is also on the staff to seek information and study the policy and transfer it into their programming.
- ii. All SAFFP people, partners and relevant others introspect, review implications and standards for their domain; become aware of; are committed to and implement their safeguarding obligations. SAFFP will ensure its support to meet their safeguarding responsibilities and requirements, understand the specific risks involved in a given context and how they can work and engage in ways that increase the safety and protection of their constituencies. This approach supports the embedding process; to become part of all- time behavior.
- iii. Ensure all staff and others (covered by this policy) understand their responsibility and role in prevention and redress of safeguarding at all times and its implications in their individual job functions.
- iv. Build individual, departmental and organizational capacity to fulfill safeguarding role and functions efficiently and effectively.
- v. Ensure a safe and trusted environment is available at all times.
(see - procedures of recruitment, reference check, supervision practice and awareness and capacity building for safeguarding)

Diagram: Focus on Safeguarding Capacity *Credit Deepika Nair*



2.2 Demonstrate commitment and accountability

- i. Respond quickly and appropriately to concerns raised. If need more time, convey a time period for action.
- ii. Have clear lines of accountability for safeguarding throughout the organization by maintaining safety and security procedures.
- iii. Develop a sense of accountability between staff so that actual and potential abusive behavior is challenged.
- iv. Allocate a safeguarding budget.
(see- Procedures for safeguarding children and adults)

2.3 Enable support through the governing process

- i. Provide all SAFP people with guidance to plan and incorporate safeguarding in all social development projects.
- ii. Provide training on how they should conduct and respond, if they suspect a child or adult experiencing or is at risk of abuse or harm.
- iii. Guide SAFP staff on how to conduct themselves in prevention and if any incident occurs, then how to behave and report concerns.
- iv. Support and guide to 'move on' and heal individually and organizationally.
(see procedure for safeguarding safety and security and safeguarding program/thematic/project management cycle)

2.4 Monitor, report, redress and record the healing / disciplining process

- i. Breaches of this policy need to be reported to the relevant authority. Following which the case will be investigated for its veracity.
- ii. Subsequently appropriate decision in accordance with disciplinary procedures and contractual agreements will be taken and communicated.
- iii. Healing through correction of behavior is a first choice where appropriate. Sanctions, including disciplinary action leading to dismissal, termination of all relations including contractual and partnership agreements, and where relevant, appropriate legal or other such actions would also be an option where behavior change is not agreed and adhered to.
- iv. If a legitimate concern about the suspected abuse of a child or young person or adult is raised but proves to be unfounded on investigation, no action will be taken against the reporter.
- v. Appropriate sanctions will be applied in cases of false and malicious accusations.
- vi. Recording each case for learning and monitoring is a must. A summary of safeguarding on financial fraud, sexual harassment and child protection also have to be reported to the district authorities.
- vii. Annual safeguarding plan should be made and reviewed before the financial audit process and a summary of the safeguarding plan and action be mentioned in the SAFP annual report. (see annex on whistle blowing and on procedure for reporting a safeguarding complaint and what will SAFP do to strengthen safeguard practice)

Section III. Safeguarding Procedures – Its practice in every day work.

This section is in three parts dealing with procedures for (A) organizational assets and its image (B) Safeguarding human resources, (C) Safeguarding in programming

A. Safeguarding SAFP assets and organization image

A. 1. Safeguarding safety and security

A.1.1 Security at work

It is the responsibility of the organization to provide safety at work and to secure working environment for not only its staff but for those who come in contact with its workforce. Workplace safety is regulated by Migrant Workers, Workmen Compensation and ESI ACT that compensate for injuries and illnesses occurring while at work. The legal framework in India is not adequate to protect people and it is thus important to look up to international jurisprudence where appropriate. Security at work is often considered by a person before joining an organization and this is gender neutral and ability sensitive. It is also important to conduct safety and security checks from time to time for further strengthening and improvement.

Safety and health of staff within a work context involves risk/hazard identification and mitigation according to government standards. This involves ongoing safety training and education for staff to prevent, report and address abuse and harm caused by bullying, harassment, sexual misconduct, breach of dignity and exclusion as provided in the FRA, PESA and SCST Acts. It also involves regular check for kitchen and toilets to be clean besides maintaining hygiene of the entire workplace.

Importance of Safety and Security

Workplace safety and security is basically the process to protect an employee from work related illness and injury and to make the workplace (building etc) safe from any injury or harm and secure from intruders and internal pilferage. Every company should have an Environmental, Safety and Health Policy statement, in other words, a workplace safety plan. This plan needs to be a part of the annual safeguarding plan that is linked with the financial audit process of SAFP. The yearly activities and next year's plan for better safeguarding must find mention in the SAFP annual report.

Security systems like CCTV and other security equipment should be in place not only to monitor the incomings and outgoings but also understanding if any harm is visible to SAFP building, assets or its people for example wires that may be exposed or walls that may have got moist due to seepage of water. Using biometric scans or other such devices ensure that only employees can enter or leave the office building. A well-lit room and building is another essential requirement of safety and security for staff. It is also important to conduct security checks from time to time such that the loopholes (if any) can be looked into. This way the security system can be regularly monitored and improved.

Along with the physical security of the employees, it is essential to ensure that important data, networks, software, equipment and company's assets are also protected. With a proper security program in place, the company premises will have higher standards. It will also ensure that a neat and clean environment is maintained. The employees form the backbone of a company. Protecting the employee details and the workplace means keeping everyone secure and the working environment is much healthier.



Communications among employees will increase and it contributes towards a happier workplace. An organization should set up a strong security system and the staff should also co-operate to ensure their safety and the safety of critical information and assets are not compromised.

A.1.2 Aspects of building/workplace security

Security awareness – build security awareness, the in-house security plan and their responsibility to all staff. The office administration, the front office receptionist, security guards and the IT unit have additional responsibilities compared to other staff.

Building security guidelines – develop office building security guidelines and place them on notice board with special notices in potentially risky rooms such as those with equipment, inflammable material or kitchen for quick reference.

Building maintenance – develop guidelines to monitor building maintenance such as any weak structures that can cause injury or serious accidents; lighting of rooms, corridors, washrooms etc; hanging live electric wires; regular maintenance of the lift system; fungal infected walls in work spaces; use of pesticides; quality of drinking water etc.

Access control facility and authority – At the entry level all the SAFP people needs to sign a conflict of interest agreement where all data of the SAFP remains within SAFP interests. Facilities are different parts of an office building that have different access control and authority. For instance, in many organizations there is limited access to the HR and accounting areas. The employee or the visitor has to take permission to get clearance to these two departments. Data storage units and warehouses too have their own access control guidelines. It basically places control on the access and usability of a sensitive asset. Authority is the person designated by the organization with complete charge of the safety of a particular organization asset.

- Server security
- Information security especially employee data and any other confidential data.
- Data, encrypted information and Network security should be another priority of the company. For data security, the network should not be shared with any outsider and should be strictly for office purposes. Access to server rooms or data closets should be limited.
- Store spaces and warehouses areas where materials (for relief or otherwise) are kept also have clear access control system.
- All staff should be aware of authorized and unauthorized access

Building surveillance

- Gates - If the opening and closing of the main gates of the office building are a part of the access control system then, the security check starts at the entry level itself. It should be paired with a surveillance device like CCTV such that the staff can confirm the entry of a visitor. The opening and the closing of the gates are generally operated through specialized locks now.
- Exterior doors - After the main entrance (gates) comes the security of the exterior doors. The employees can simply use their ID cards to open the doors or use biometric scans while the visitors are directed to a particular entrance. A visitor's card should be given to them (even with known vendors) for the time they are in the office building.
- Biometrics -The biometrics has become a common part of the security system used in the office buildings. Fingerprint, retina and hand geometry are some of the common variations of the biometrics in large offices.
- All the above are subject to resources and size of the organization thus SAFFP will have to use its discretion as appropriate.

A.2. Security of SAFFP people

A. 2. 1 Medical emergencies

- Keep medical emergency numbers of ambulance service, doctors, nearby hospitals for ready use; pin them on the notice board and in corridors or rooms for quick access; office administration to be responsible with someone designated to periodically update these numbers. Many organizations have a couple of doctors screened from the neighborhood for consultations on any emergencies; or have an inhouse doctor's panel.
- Develop guidelines on how to address emergencies while on official travel or in the field.
- Develop guidelines on informing key people in office(s) and family of the person especially in serious cases.

A. 2. 2 Protection from accidents including fire, theft, fraud, hooliganism

Fire safety

- A part of the building maintenance is to monitor the electric circuits and wiring; cooking gas leakage; positioning of inflammable material such as gas cylinders, manual file stores. Office building with heavy wooden wall paneling are potential inflammable fire hazard. Office administration is normally in charge with someone designated for periodic physical monitoring and supervision. This includes fire extinguishing equipment too.
- Put a fire safety system in place along with the state Fire department in the neighborhood.
- Every staff member should be aware of the fire drill and how to kick start action for protection and extinguishing. Have one or two fire drills with staff in a year
- Include safety and security knowhow as part of inducting new staff
- Train all staff to operate a fire extinguisher
- Develop guidelines and train staff on what to do and how to evacuate a room or the building.

Theft/Fraud

- Develop safety guidelines for use within office and on travel. Include cash in transit especially while bringing cash from the bank/ATM for use in emergencies
- Develop guidelines for use of personal equipment and vehicles for sudden emergencies when official equipment or vehicle is not available.

Hooliganism

- Develop prevention and protection guidelines with the support of local police
- All staff to be aware of what to do when there is potential danger or sudden actual episode takes place
- Office administration is normally in charge in such exigencies.

A. 2. 3. Disasters and Emergencies

- Prevention preparedness in and out of office – develop guidelines for fire safety measures; accidents; medical; personal safety; health care that includes physical, mental and emotional wellness; personal conduct and behavior
- Disaster preparedness and management - Include guidelines on what to do when an emergency arises or get caught in a sudden riot or in an earthquake, floods. Train staff on these and include in the induction plan for new staff
- Evacuation – develop guidelines for evacuation of the office building. Include guidelines on what to do if caught in any other building or in any other emergency such as a sudden riot, local hooliganism. Train staff on these and include in the induction plan for new staff
- Emergency exits – safeguard these exits by keeping them open without any clutter
- Periodically check whether the doors open out in emergencies. Do not block the exit with anything even with a pile of papers.

A. 3 Security Audit

A. 3.1. Agree to the yearly safeguarding calendar

- Conduct periodic and surprise checks to see and improve safety and security measures
- Develop tailor made skills, security and safeguarding audit checklist. Set a date in a month, before the performance review to score each SAFP person on safeguard conduct and skills.
- Set a date for organizational safeguard audit for both safety and security to ensure that all staff have received safeguard training and all safety drills have been conducted within the year.
- Office administration is normally the overall in charge with persons designated for individual or multiple tasks.

A. 3.2 Monitor maintenance and capacity of assets and hardware as part of safeguarding

- Timely, regular maintenance of office assets and hardware is critical for its smooth and efficient function for higher productivity, safety and emotional wellness of staff
- Monitor vendors for quality against a checklist and timely output. If not delivered, change vendors after 2 or 3 warnings.

(Refer SAFP Staff Security Guidelines and the checklist framework with an example of the vendor service in Annex 6).

A. 4. Procedure for reporting a safeguarding concern.

A. 4.1 Understanding Concern and its context

i. Definition of a concern

A concern is an expression and a statement that something is unsatisfactory or unacceptable vis-a-vis the prescribed standard of quality work or is related to the actions taken or lack of action by staff or associates that directly or indirectly cause distress to the affected party.

ii. Anonymous concern

It can be difficult in some circumstances to speak out openly therefore SAFP will accept and handle anonymous complaints with caution if there is sufficient information to clarify the issues, substantiate claims and investigate allegations properly.



rehabilitate and restore their reputation.

iii. Malicious concern

When the investigation finds that an accusation was deliberately made falsely and with the aim of causing harm, and if the complainant is a staff of SAFP, appropriate disciplinary action will be taken including dismissal. Reporting which proves to have been made maliciously will be viewed as a serious disciplinary offense. If the identity of the person against which the malicious accusation was made publicly known, SAFP will take due care to

iv. Whistle Blower

It takes one person to recognize abuse, violation or a safeguarding misconduct. This person who raises the concerns and reports to the Manager HR a safe guarding complaint is the Whistle Blower. Indian legal process on Whistle Blowing and protection has not got clearance. It refers to financial misconducts like bribery and fraud.

Whistle blowing as an important safe guarding role is encouraged and protected by SAFP. Often a person who reports a matter is coerced to take back the complaint. For this reason, reporting of the matter is to be done in confidence to the Manager HR, who will take charge of the issue to take it to a positive resolution. Please refer to the detailed whistle blowing policy and procedure provided as Annex along with a concern reporting format. The diagram below depicts the safeguarding system that can explain these processes and the flow of a concern and healing the harm done.

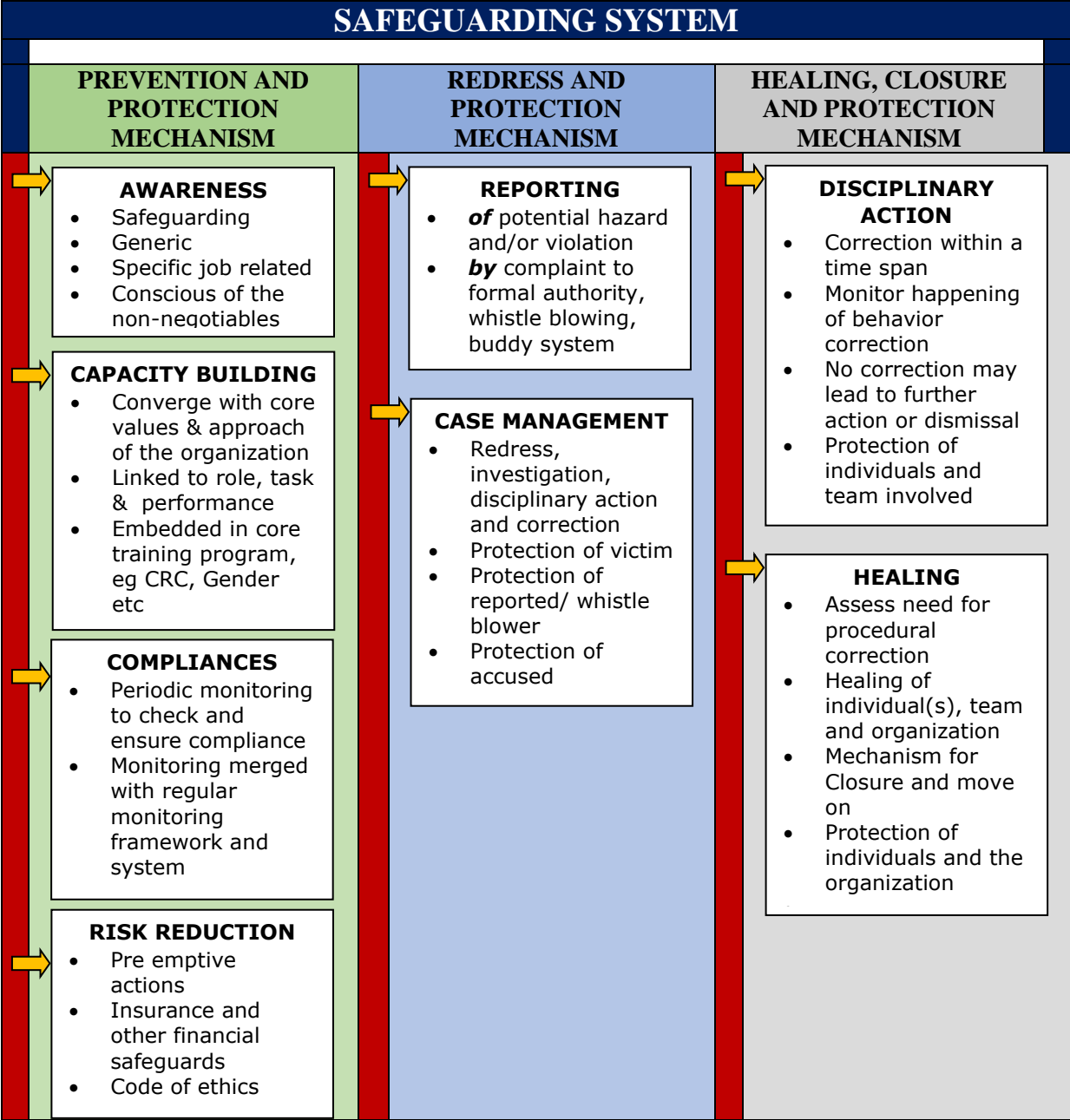


Diagram: Safeguarding systems Credits: Amod Khanna and Deepika Nair SAFP

A. 4. 2. Working with partner organizations

SAFP recognizes that the primary responsibility to handle complaints from the community is with the partner organizations. SAFP will strategically and consistently encourage partner organizations to develop their own complaints handling mechanism by:

- i. **Providing support for setting up contextualized Concern Handling Mechanism (CHM)** and raising awareness on expected behavior and channels for complaining by providing support for capacity building with regards to investigations and attempt to build a harmonized system of support
- ii. **Handling abuse with the principle of best interest of the child in view.** SAFP recognizes that allegations (i.e. when a specific allegation of abuse is made against a named individual) and concerns (i.e. when concern is expressed about abuse that may have taken place or be in prospect) should always be taken seriously and acted upon swiftly, making the welfare of children the paramount consideration. The principle of 'best interests of the child' and the desire to secure the best outcomes for the child should always govern decisions regarding what action to take in response to concerns.

A. 4. 3. What will SAFP do to strengthen safeguard practice?

SAFP Management has designated the HR Manager who is responsible for managing safeguarding within the organisation, by regularly reviewing and improving systems, policies and procedures and overseeing the handling of safeguarding cases. She is the executive secretary to a Safeguarding Committee that can be called to action when deemed necessary by the Executive Director who regularly participates in meetings. The Manager HR will be responsible to implement the Safeguarding Plan agreed by the board based on the availability of resources. The Executive Director will depute staff to raise resources for the safeguarding mandate of SAFP. The terms of reference for the SAFP's Safeguarding Committee and the safeguard role to add to Manager HR Job description is annexed for a reference. Details are provided in the Annex

B. Safeguarding Human Resources

B. 1. Safe Recruitment

SAFP's current recruitment and employment policies and procedures already provide the framework for good practice set out. These policies have been reviewed and strengthened in the light of the principles and outcomes described in this safeguarding policy. Additionally, the candidates will be asked to describe their previous experience of working with children and vulnerable adults, to provide two referees who can comment on their work with children and vulnerable adults. This will happen with internal and external candidates as well as for consultants and volunteers.

Advertisements and job descriptions for identified posts will include a reference to SAFP's commitment to a Safeguarding Policy with a special reference to children and vulnerable adults. Job offers made in relation to identified posts will be subject to a self-disclosure, satisfactory clearance from checking of statutory and satisfactory verification of qualifications and work history.

B. 2. Reference check before being designated as a SAFP people

The existing practice of reference check from past employers, or a government/Ngo officer or attestation with a PAN card plus the Aadhar card is applicable now for all entrants. SAFP already has a well worked out system of a sign off of a child protection statement for each new entrant. Additionally, may consider for staff who work with children a police verification for no criminal record, domestic violence or sexual offense.

B. 3. Supervision practice induction to exit

On arrival at SAFP workplace, a buddy can be appointed by the Safeguarding Committee to make the new entrant understand the implication of the Safeguarding Policy as well as give advice to make sure that the new comer will cause no harm and is not harmed during the time they are termed as SAFP person.

In every day work SAFP people come into contact with large numbers of children. This work takes place within the good practice guidance of SAFP policy. SAFP undertakes to ensure that all SAFP people whose work might involve contact with children and vulnerable adults, will have completed the safeguarding training that is included in induction and in an annual refresher training for all SAFP people. This can be an online course that asks a sign off to clear a test or abide by the Code of Conduct. and obtain a satisfactory performance appraisal score on their safeguarding role. A power point presentation and the training report can be utilized to train trainers in SAFP for the ongoing task of developing and strengthening safeguarding capabilities.

Intensive training for additional conceptual clarity to apply safeguarding in Child Rights, gender, inclusion, consent and related laws for its application in programming is required. Staff should be able to translate these into their job roles and functions.

B.4. Increasing awareness through a safeguarding calendar

- SAFP's commitment to safeguarding will be stated in appropriate publications and its website.
- SAFP will make its policy and procedures available to anyone who requests as appropriate.
- At the time of recruitment all staff and volunteers will be required to sign the Code of Conduct after a thorough understanding and studying its implications with the new recruit and their JD.
- SAFP will ensure that staff attend an annual briefing session on Safeguarding Policy and have access to a copy. This is also included in the induction program for all new staff and for volunteers who may have contact with children and vulnerable adults
- All managers have the responsibility for ensuring that the staff they manage are aware of the policy, and for reminding them of its provisions when the need arises. Managers of identified posts must take part in safeguarding training
- The training needs of staff in identified posts will be assessed and relevant training provided using national agreed training resources

- Staff in sections or teams whose work involves frequent face to face contact with supporters, or presence at local or national events, should ensure they are familiar with the detail of this policy.
- Staff should also know the identity and contact details of the Safeguard designate i. e. HR Manager and have contact details for statutory authorities including help line numbers and the Police
- SAFP staff planning events should ensure that safeguarding issues are considered as part of the risk analysis and/or health and safety arrangements
- In planning or coordinating multi-agency or coalition or network organised events and activities, SAFP will ensure that all safeguarding considerations have been taken into account if relevant.

B. 5. Safeguarding Children

The UN CRC and the Indian legislations dictate the framework for operations with and for children. The term children include, both girls and boys of different age cohorts up to 18 years living in different contexts and girls and boys who are differently abled as per the RPWD Act. Thus, disaggregated data for risk practices assessment, analysis and program design is important. Children with different grades of disabilities; children in schools; children living on the streets, in institutions, even in homes experience different forms of safety issues and harmful practices. Harmful practices that are intentionally or unintentionally done with strong roots in local culture and perspectives related to childhood, child development and other local discriminatory practices. SAFP will ensure that children are growing up with safe and effective care and they get optimum life chances and enter adulthood successfully. For example:

- SAFP expects that contact with children in schools and other children’s spaces by staff and volunteers, will be supervised by school staff to minimize the likelihood of situations occurring in which they are the lone adult with one or more children. For example, by having another school staff present when with children in a workshop or in an interview. If such situations are unavoidable, precautionary measures should be taken, for example leaving the door to the room open or moving to an area where each is in plain view of others.
- In any activity or event involving children which SAFP or her partner has directly organised, a member of staff will be designated as the Designated Safeguarding Lead (DSL) or at the minimum be attended by a member of staff who has received Safeguarding training.

i. Promote need to safeguard children below 18 years as per their evolving capacity

Promoting safeguarding is a mandate for all children, all adults and all local state and private institutions who directly or indirectly interact with children.

- Protect all children below 18 years in operational areas
- Add special focus on vulnerable and marginalized children in operational areas
- Add special focus on children with disabilities

- Promote safe and inclusive communities
- Promote safe and inclusive services, buildings, public spaces and pathways/roads
- Promote active participation of children, adults and local institutions in developing and practicing protection guidelines.

ii. Build capacity of children in safeguarding

Child participation and evolving capacity is a critical right in the UN CRC. Capacity will evolve as children grow and take on more and more responsibilities and act in leadership roles. But this needs to be systematically delivered and involve children wherever appropriate. Adults then have the responsibility to showcase behavior and conduct on safety and protection in homes, in public spaces, in the community and local institutions.

- Develop capacity and responsibility of children on safety of self and safety of other children
- Develop a list of disciplinary measures with children in the event of an child to child injury or harm that is done intentionally
- Correct behavior in an enabling manner by building capacity in positive disciplining techniques
- Develop capacity of children on safeguarding at home, in the neighborhood, in children's parliaments, *bal sabhas*, schools, health centers, on the roads and any other spaces where children congregate.

iii. Build local capacity in safeguarding

To fulfill adult obligations as per the UN CRC mandate and agreed by the Indian state, SAFF and its partners and local interested institutions will need to develop local capacity and build consensus for change. Without the knowhow and skills it is difficult to practice change at home and in the larger community.

- Build perspectives and promote the need to safeguard children and the responsibility of adults at homes; in *anganwadis*, schools, tuition centers, arts and craft, dance, music, painting, sports centers; in the community and in the local institutions (panchayat, PHC etc) of both state and private bodies in SAFF operational areas
- Promote the development of guidelines for practice in the above listed institutions and public spaces
- Build capacity of adults and institutions who directly or indirectly work with children
- Develop capacity in inclusion and safeguarding children including children with special needs
- Develop capacity in risk assessment, planning, monitoring, reporting and correction in safeguarding.

B. 6. Safeguarding Vulnerable Adults

SAFF works with vulnerable and marginalized communities who are more at risk to safety, security and harmful practices rooted in the local culture, beliefs and local power equation. Similar to working on safeguarding with and for children; safeguarding vulnerable and marginalized adults will also entail working with them, the larger community and the local institutions. A doubly disadvantaged group within them will be persons with disabilities; the dependent frail and elderly, the very ill with near absence of any support mechanism for day to day needs and/or financial assistance. Many studies have highlighted

the high incidence of abuse, neglect, homelessness and danger to life that these people face on a regular basis.

SAFP defines vulnerable adult as:

- Elderly and frail
- Has a mental health disorder including dementia or a personality disorder
- Has a physical or a personal disorder
- Has a severe physical illness
- Is a substance misuser
- Is an unpaid carer
- Is homeless, displaced or exploited
- Has a learning disability.

Unlike bringing change in the children's world; bringing change in attitudes, beliefs and behaviors towards vulnerable and marginalized adults and those with disabilities is very challenging. SAFP will ensure that vulnerable adults receive safe and effective care and get optimum life chances with dignity.

i. Promote awareness and the need to safeguard vulnerable adults

- Promoting safeguarding is a mandate for all adults and all local state (*panchayat*, PHCs, *gram sabhas*, various state units) and private institutions working in SAFP operational areas
- Promote safety and security of all vulnerable and marginalized adults in the SAFP operational areas
- Promote safe and inclusive communities
- Promote safe and inclusive services, buildings and pathways/roads
- Promote active participation where feasible in developing and practicing protection guidelines
- Promote the need for support services especially targeted for vulnerable adults.

ii. Build capacity to deal with drug peddlers and other related substances in the community

It is critical to control the source, sale and access to drugs and other forms of substances as they are not only a risk to adults but also to children and young people in the community and thereabouts.

- Involve the local community and local state institutions to tackle the source and access to drugs and other substance use. Build local capacity in safeguarding against them.

iii. Build capacity of vulnerable adults in safeguarding

- Build local community-based rehabilitation initiatives
- Build community-based support initiatives for unpaid carers.

iv. SAFP and its partners, the local community and local institutions will need to develop capacity to practice safeguard vulnerable adults

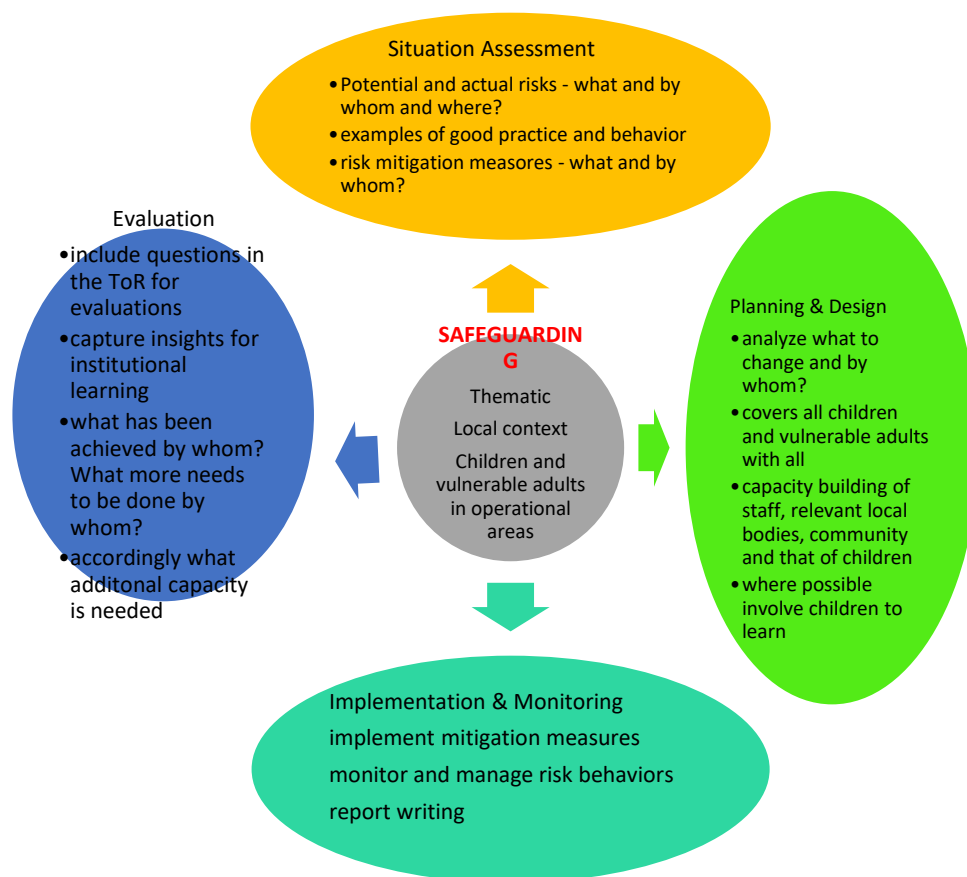
- Promote the development of guidelines for practice in the above listed institutions and public spaces
- Build capacity of adults and institutions who directly or indirectly work with vulnerable adults

- Develop capacity in inclusion and safeguarding vulnerable adults
- Develop capacity in assessment, planning, monitoring, reporting and correction in safeguarding.

C. Safeguarding in SAFP programming

C. 1. Safeguarding in over-all programming

- i. All partners (current and potential) to be informed that the need for a **safeguarding policy and procedure** with each partner is a mandatory requirement. If they do not have but in principle agree with the concept and practice of safeguarding, and are willing to follow the SAFP. safeguarding policy and procedure document and subsequently want to develop their own policy, should be sufficient to start the partnership if all other requirements are met.
- ii. Clarify **theme** specific risk assessment, prevention and mitigation requirements and its need to incorporate in the design of the thematic strategy and project.
- iii. A safeguarding focused risk assessment will take place for every new **project** as part of the risk assessment process during the project design phase. Add a specific section on safeguarding risks (potential or real) to children and vulnerable and marginalized adults in all strategies and projects of SAFP.
- iv. A risk assessment will also be conducted for any other **activity** directly involving vulnerable adults and/or children, including fundraising and communications activities where contact is made and information on individuals is gathered.
- v. The risk assessment will include **mitigating** actions, which will be incorporated into project design/documentation. This may include supporting training of partner staff.
- vi. A risk assessment and mitigation **monitoring** exercise should be conducted every 6 months in all projects as part of project reporting exercise; and mid project if the total project duration period is less than 1 year.
- vii. Document lessons for institutional learning to improve programming and HR capacity development.



C. 2. Safeguarding in theme specific risk assessment, protection and mitigation

Acknowledging safeguarding risks and implementing measures to address them is fundamental to an organizations’ strategies and governance. The more this is recognized, the more risks can be prevented. To achieve this SAFP and its partners need to consider:

- i. Where, when and how does this theme affect children and vulnerable adults and what risks this presents?
- ii. What procedures are needed to prevent harm and how to respond to concerns appropriately?
- iii. Who is the appropriate designated person/s to act as the safeguarding thematic focal point to receive and manage any safeguarding concerns and subsequent inquiry/investigation in SAFP and partner?

- iv. What safeguarding induction and training is needed to ensure staff of SAFP and partner know what is expected of them and what to do if they have a concern?
- v. Need a clear code of conduct so that all staff of SAFP and partner understand their professional boundaries when working with children and vulnerable adults and what is and is not acceptable behavior.

C. 3. Safeguarding in project management cycle

Project Management Cycle



C.3. 1. Situational Assessment and Planning

If potential partners are already practicing even some elements of safeguarding, then SAFP can move ahead seeking information on the following list. This list is not exhaustive, but gives an initial information base to make 'safeguarding' a work in progress with the partners, as long as they are in agreement with this approach.

i. Log Frame Analysis (LFA)

Include columns on safeguarding risk assessment and mitigation strategies; and activities and outputs within a timeline.

ii. **Conduct a Safeguarding risk assessment as a bench marking exercise in the proposed operational area to look into the following:**

- Environmental sensitivity, protection and sustainable growth especially in areas prone to natural and/or man-made disasters
- Social discrimination or harmful practices including neglect and acts of omission towards children and vulnerable adults in the community
- Documentation of safe and positive practices as part of local culture
- All the above need to feed into design of project strategies.

iii. **Safeguarding risks and vulnerability mapping of the project target/beneficiary group in the operational area**

- List who are the project's target/beneficiary group(s) and their population size in the proposed operational area.
- Please specify why have they been identified?
- Map the safeguarding risks they face on a day to day basis – what risks,

C.4. Safeguarding risk assessment approach of potential and current Partners

- i. What and whom do partners safeguard?
- ii. Do partners have a written safeguarding policy and procedure document?
- iii. How safe relationships are monitored in controlled groups in projects e.g. children's parliament, *bal sabhas*, women's groups, community- based organizations etc.?
- iv. What infrastructure safety and security measures are followed?
- v. Do partners have a financial and/or material safety and security policy?
- vi. Do staff and relevant others have a code of conduct?

C.5. Implementation and Monitoring Safeguarding in Programmes

- Do a midterm appraisal of the risk mitigation referred in the log frame.
- Do a complete safety and security scan against the initial bench mark exercise and give the program manager a safeguarding score that finds a mention in the annual performance appraisal of the lead person in-charge.

i. Evaluation

Include appropriate questions related to safeguarding.

ii. Documentation for institutional learning

Lessons in safeguarding to be filtered and documented to improve gaps in safeguarding policy and procedures; training and development for staff and partners to improve programs on the ground

Section VI The Safeguarding Workplan



The next steps from October 2019 to March 2020

1. **Conceptual understanding:** Understand what safeguarding means for in context of social teaching and laws in India to adopt the SAFP definition of safeguarding to include it in all policies and operationalized it at different levels within the organization in the organizational annual plan.
2. **Capacity building of SAFP people:** To understand skills needed to develop to perform a safe guarding role by including action planned within the department quarterly plans. Get partners on board to adapt SAFP safeguarding policy and practice as a mandatory prerequisite to a financial compliance.
3. **Agreeing to a new safeguarding policy** that includes cross reference to all other policies guide lines and procedures especially the social teachings.

LONG TERM PLAN (April 2020 to March 2022)

1. **Inclusion of safeguarding in all other policies:** Set up a three-member team to revise all policies to include safe guarding role of SAFP personnel, partners, volunteers and consultants for easy readability as suggested by the safeguarding audit.
2. **Reformatting inhouse guidelines and procedures:** Set the management process in place to embed the policy in practice: Include the line “SAFP people are responsible to safeguard children and vulnerable adults from harm and abuse to safeguard SAFP reputation of preventing and responding to safety and security issues” in all job descriptions. Add specific task relating to safeguarding in each role.
3. **Introducing safeguarding in programme cycle :** Commission an extensive program safeguarding exercise to specify how vulnerability is defined and abuse and harm prevented as a risk mitigation result based plan that is managed systemically within SAFP for safeguarding action in each sector.
4. **Agree to an annual safeguarding cycle in sync with weekly, monthly and yearly reporting**

The safeguarding planning needs to be added within the annual plans to all SAFF peoples work plans. This can be reported monthly in staff meetings to announce the safety drill, training and safeguard appraisal due that month.

5. **The embedding process and monitoring impact:** Conduct annual safeguarding audit along with the annual finance audit. Include the quality of safeguarding action in the performance appraisal of each staff member.

Annex 1 - SAFP Safeguarding the communication about children and vulnerable adults

- SAFP people should try and make sure that those who may wish to use images/stories of children or vulnerable adults cannot misuse or exploit them. Producing communications about children would count as indirect contact if consent is not signed up from the child and their guardian or the vulnerable adult.
- SAFP people should always acquire informed consent from the child's parent/guardian, the child's school or the NGO/Partner responsible for the child, and from the children themselves to use the images and stories for SAFP publications. However, it is not necessary to gain specific individual consent for those in crowd shots. With vulnerable adults their consent, or depending on the nature of their vulnerability their guardian's consent must be sought.
- Personal information about a child that could be used to identify his/her specific location within a country should not be used to accompany images.
- In addition, SAFP communications about children and vulnerable adults should respect their dignity and identity and not degrade them. Therefore, when communicating about children and vulnerable adults care should be taken to:
 - Portray them as realistically as possible and communications about children and vulnerable adults should not be sensational, or overtly sentimental
 - Take care to represent the ethnic diversity of the children and vulnerable adults in areas where SAFP works
 - Try to represent children and vulnerable adults as individual human beings, with their own opinions and history
 - Images of nude or partially clothed children or adults should not normally be used, although in portraying the lives of children in developing countries in a realistic way this may be appropriate and indeed unavoidable. However, images of children in states of undress should not present them in poses that could be interpreted as sexually suggestive or in ways that impact negatively on their dignity or privacy. Should staff wish to use this type of imagery, they should consult the SAFP Safeguarding Committee to discuss whether it is appropriate
- Be aware that certain children and vulnerable adults may need extra safeguarding. For example, former child soldiers, those suffering from HIV and AIDS and victims of violence, abuse and exploitation. For example, children and vulnerable adults that have experienced violence or are in some way particularly vulnerable or if identified, should not have their faces displayed or be represented in a way that may lead to their identification

- In many cases it might be appropriate to withhold or change names
- Decisions about the appropriateness of the use of images of children and vulnerable adults by SAFP should be made by the Head of Communications and Education or the Communications Manager.
- Journalists and photographers working with, or on behalf of SAFP will be asked to sign the Code of Conduct as all SAFP People.

Annex 2 - SAFP People Safeguarding Code of Conduct

As an employee or representative of SAFP, I will promote its values and principles and protect its reputation by:

- Respecting the basic rights of others by acting fairly, honestly and tactfully, and by treating people with dignity and respect, and respecting the national law and local culture, traditions, customs and practices that are in line with Catholic Social Teaching, moral teaching and UN conventions
- Working actively to protect children and vulnerable adults by complying with SAFP's Child and Vulnerable adults Safeguarding Policy and Procedures
- Maintaining high standards of personal and professional conduct
- Protecting the safety and well-being of myself and others
- Protecting the organisation's assets and resources
- Reporting any matter that breaks the standards contained in this Code of Conduct.
- Maintaining high standards of personal and professional conduct means I will not behave in a way that breaches the code of conduct, undermines my ability to do my job or is likely to bring SAFP into disrepute.

For example, I will not:

- Engage in sexual relations with a child or a vulnerable adult or abuse or exploit a child or a vulnerable adult in any way regardless of the age of majority or age of consent locally. Mistaken belief in the age of a child is not an excuse
- Exchange money, employment, goods, assistance or services for sexual favors or other forms of humiliating, degrading or exploitative behavior
- Engage in any form of harassment, discrimination, physical or verbal abuse, intimidation, favoritism or exploitative sexual relations
- Drink alcohol or use any other substances in a way that adversely affects my ability to do my job or affects the reputation of the organisation
- Be in possession of, nor profit from the sale of, illegal goods or substances
- Accept bribes or significant gifts (except small tokens of appreciation) from governments, beneficiaries, donors, suppliers or others, which have been offered as a result of my employment
- Undertake business for the supply of goods or services to family, friends or personal contacts or use SAFP assets for personal benefit
- Behave in a way which threatens the security of myself or others
- Use the organisation's computer or other equipment to view, download, create or distribute inappropriate material, such as pornography.

In relation to child and vulnerable adults safeguarding, It is important for all staff and others in direct contact with children to:

- Be aware of situations which may present risks and manage these
- Plan and organise the work and the workplace so as to minimize risks

- As far as possible, be visible in working with children or vulnerable adults
- Ensure that a culture of openness exists to enable any issues or concerns to be discussed
- Ensure that a sense of accountability exists between staff so that poor practice or potentially abusive behaviour does not go unchallenged
- Talk to children or vulnerable adults about their contact with staff or others and encourage them to raise any concerns
- Empower children or vulnerable adults - discuss with them their rights, what is acceptable and unacceptable, and what they can do if there is a problem.

Staff, volunteers and relevant others must never:

- Hit or otherwise physically assault or physically abuse children or vulnerable adults
- Develop physical/sexual relationships with children or vulnerable adults
- Develop relationships with children or vulnerable adults which could in any way be deemed exploitative or abusive
- Act in ways that may be abusive or may place a child or a vulnerable adult of abuse.
- Staff and others must avoid actions or behaviour that could be construed as poor practice or potentially abusive. For example, they should never:
 - Use language, make suggestions or offer advice which is inappropriate, offensive or abusive
 - Behave physically in a manner which is inappropriate or sexually provocative
 - Spend excessive time alone with children away from others
 - Take children or vulnerable adults to your home, especially where they will be alone with you. Have a child/children or vulnerable adult(s) with whom they are working to stay overnight at their home unsupervised
 - Sleep in the same room or bed as a child or vulnerable adult with whom they are working
 - Do things for children or a vulnerable adult of a personal nature that they can do for themselves
 - Condone, or participate in, behavior of children or vulnerable adults which is illegal, unsafe or abusive
 - Act in ways intended to shame, humiliate, belittle or degrade children or vulnerable adults, or otherwise perpetrate any form of emotional abuse
 - Discriminate against, show differential treatment, or favor particular children or vulnerable adults to the exclusion of others.

I..... do hereby confirm that I have read, understood and commit myself to comply and to be held accountable for any non-compliance and non-reporting.

I also have read and understood the SAFP Safeguarding policy and procedures document to know about the aspects of safeguarding that relate to my role that I summarize as under in my own words

(Signature) Date:

Please note: you should keep this copy of the policy for your records. An additional acknowledgement form will also be issued for your signature and which will be kept internally.

Annex 3 - SAFP Policy on Whistle Blowing and the concern raising procedure

A. Introduction

All SAFP Staff are required to report whenever a suspicion of abuse/harm/exploitation involving SAFP Staff or other humanitarian workers is raised, even when they may not have all the facts at hand. For raising this concern through a formal report they would be blowing the whistle of caution.

- **Definition of Reporter/ Whistle blower**

An individual who identifies and reports suspected incidents of harm/abuse or exploitation of a child or vulnerable adult.

B. Policy statements

1. On witnessing potential harm, or suspecting abuse or exploitation of a child or a vulnerable adult it is mandatory for SAFP people to play the role of a whistle blower. Thus, it is an obligation to report any potential breach of the SAFP Code of Conduct or the SAFP Safeguarding Policy and Practice. Not complying with this rule leads to disciplinary action.
2. SAFP prohibits any employee from retaliating in any way against anyone who has raised any concern about harassment, sexual harassment, fraud, misconduct or discrimination against another individual.
3. No adverse employment action will be taken for any employee making a good faith report of violation, harassment or abuse.
4. The report can be made formally to the SAFP safeguarding committee or reported to a buddy who can take the reportage on behalf of a person who has a personal concern.

Procedures For raising concern

1. Who can be a whistle blower to raise a concern under this policy?

- Concerns received by SAFP against a partner organization will be referred back to the partner organization for follow-up and action.
- SAFP India's staff and associates.

2. Policy designates



- All employees, and particularly managers, have a responsibility for keeping the work environment free of harassment and abuse.
- Any employee who becomes aware of a safeguarding incident, whether as a witness, or being told of it, or being the object of it, is strongly encouraged to report it in accordance with the safeguarding policy and the Concern Handling Procedure (SAFP CHP).

- When supervisors or coworkers become aware of possible safe guarding lapses like a security and safety breach, financial irregularity or a fraud, harassment or abuse of any SAFFP person or associate, child or a vulnerable adult they should immediately bring it to the attention of the Manager HR in accordance with the SAFFP CHP.

3. Kind of concerns

Possible concerns may include, but are not limited to

- Behavior or conduct of SAFFP people
- Behavior or conduct of partner organization staff and associates
- Financial improprieties such as misuse of funds, fraud or corruption
- Harassment, including sexual exploitation and abuse
- Emotional abuse such as intimidation, humiliation, bullying and mobbing
- Safety and security breach that will harm the organization and its people

4. Confidentiality

- Confidentiality is paramount to guarantee safety to concerns, whistle blower, witnesses and subjects of concerns. All concerns, whether sensitive or non-sensitive will be handled in a confidential manner
- In case of breach of confidentiality, SAFFP may take disciplinary action
- Information with regards to complaints and related investigations should only be shared on a need-to-know basis, clearly identified for each case. Disclosure may be required by law or by the management in the interest of parties involved or for reasons of referring the case to an expert for a medical, legal, child right, sexual harassment. criminal or other issue
- The cases where it may be necessary to disclose information to third parties there will be an agreement with the person who is the subject of concern to take into consideration specific requirements and any risks to parties involved
- Concerns that indicate a possible criminal offence has been committed should be referred by SAFFP to the authorities responsible for investigating such matters.

5. What can a Whistle Blower keep in mind while witnessing a concern?

- Information offered in confidence should be received on the basis that it will be shared with relevant people in authority: this might include the HR Manager and the members of the safeguarding committee and/or, if appropriate, safeguarding personnel in statutory agencies
- Parents or carers will also be informed if appropriate and in cooperation with statutory authorities or relevant agencies
- Apart from this, confidentiality will be observed.

If a child or vulnerable adult tells you they are being, or have been, abused:

- Listen to and accept what the child or vulnerable adult says

- Immediate action must be taken to ensure the child or vulnerable adult's safety
- Do not investigate and do not inform, question or confront the alleged abuser
- Take the alleged abuse seriously
- Reassure the child or vulnerable adult that they have done the right thing by telling you
- Let them know you need to tell someone else. Do not promise total confidentiality
- Let the child speak or vulnerable adults freely but do not press for information
- Let the child or vulnerable adult know what you are going to do next and that you will let them know what happens
- Record carefully what you have heard whilst it is still fresh in your mind. Include the date and time of your conversation and any incident disclosed. (Refer to Concern form in the Annex).

6. Steps to take when suspecting abuse

If any member of staff or volunteer suspects abuse, or if a child or vulnerable adult makes a disclosure, or if a person external to SAFF reports a suspicion or allegation relating to SAFF people, or its activities, the following steps should be taken:

- Avoid any delay
- Report to the HR Manager or in their absence another member of the SAFF Safeguarding Committee
- If the suspicion or allegation relates to activities or persons working in a school, parish or diocesan setting, ensure that the relevant representative is also informed
- The Safeguarding Committee will ensure appropriate follow up. If urgent action is required to protect children this should be done immediately.
- **No staff member or volunteer will prejudice their own standing or position within SAFF by responsibly reporting potential or suspected child abuse.**

7. Concern against member of the clergy or religious congregations

- Concerns made against staff and associates that are members of the clergy or religious congregations are dealt with in coordination with the religious order of belonging or the competent Bishop.

8. What concerns will not be processed

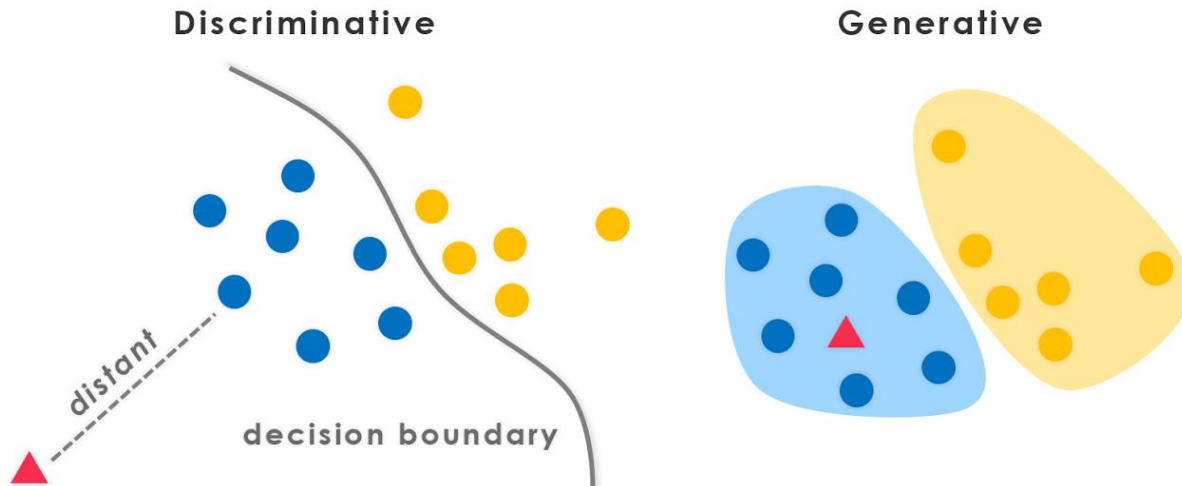
- Concerns related to member organizations staff grievance, performance issues, employment and labour matters, hostile work environment, harassment on the workplace are dealt exclusively by member organizations through appropriate country legislation and HR policies.

9. What will SAFF do to process a safeguarding concern

- Sexual violence and child abuse is a huge personal tragedy for the harmed individual. In the event of any allegations, SAFF's first concern will always be to care for their

emotional, physical, psychological and social well-being. SAFP undertakes to provide support for the alleged victims, witnesses and the alleged abuser whilst an investigation is carried out. SAFP will also seek to ensure that any continuing support needed after a situation has been resolved is made available.

- If a disclosure of abuse takes place in which the alleged abuser is a member of SAFP staff, a volunteer or relevant other, or the incident has taken place on SAFP premises or in connection with SAFP activities, SAFP will inform the police and statutory authorities.
- If a suspicion is expressed, SAFP will undertake a risk assessment and then take appropriate action, which may involve contacting statutory authorities.
- A thorough internal investigation to establish what happened and determine how the case should be handled in accordance with SAFP policies and procedures precedes handing case to the statutory authorities.
- The aim of this investigation is to determine whether there was a breach of code of conduct or of the policy and procedures. It is not a criminal investigation into the allegations of abuse in order not to prejudice the policy investigation and subsequent prosecution.
- If a member of staff is the subject of an allegation of child abuse or abuse of a vulnerable adult, that staff member will be asked to take leave from their duties on full pay until an investigation has been completed.
- If a SAFP volunteer or relevant other (i.e. paid consultant or journalist working on behalf of SAFP) is the subject of an allegation of child abuse, that volunteer or relevant other will be asked to withdraw from their work until an investigation has been completed. In both cases, it should be made clear that suspension does not imply guilt but rather protects all parties whilst an investigation is undertaken
- If an allegation of abuse is made involving a member of SAFP staff, this allegation, together with a record of the investigation undertaken and the outcome, will be recorded in a separate personal file. Confidentiality regarding these records will be scrupulously maintained and information will only be released to the line management of the staff member concerned or to those in positions of authority externally who have reason to need it for the safeguarding of children or vulnerable adults. Records will be kept for 10 years and disposed after recording data on nature of complaint and resolution for reference of safeguarding system improvement.
- After the case has been investigated internally, SAFP will conduct a learning reflection of its management of the case. Key learning points will be incorporated in appropriate policy and practice revision. The framework of decision taking is to create more harmony so that safeguarding is generative of peace and love for God and his people.



A. Complaint Handling Procedure

If you suspect a child or vulnerable adult is being physically, sexually or emotionally abused you should report your suspicions on SAFF’s Concern Report Form and pass it immediately to SAFF HR Manager or in their absence another member of the SAFF Safeguarding Committee.

If a child or vulnerable adult discloses to you abuse by someone else you should listen, offer support, understanding and reassurance whilst explaining you have to tell appropriate people. As soon as possible you should report your suspicions on SAFF Concern report form and pass it immediately SAFF Safeguarding Coordinator or in their absence another member of the SAFF Safeguarding Committee Safeguarding. In all cases:

- Take emergency action if required – contact police/social services/medical services immediately as required if it is an emergency situation
- Record everything that was said, including dates, times of conversation and any incidents disclosed
- You must refer
- **You must not investigate.**

B. Partners Concern Reporting

If a concern is from someone not present and is among the SAFF’s partners, it should be referred to SAFF Safeguarding Committee who will note this issue on a log. The SAFF Safeguarding Committee will follow up with the partner to ensure that the case has been reported to the relevant bodies and is being managed appropriately. All such issues will be escalated to the Executive Director and Board. The SAFF Safeguarding Committee will inform the appropriate regulatory bodies and the donor as required.

SAFF undertakes to provide support for the alleged victims, witnesses and the alleged abuser whilst an investigation is carried out. SAFF will also seek to ensure that any continuing support needed after a situation has been resolved is made available.

If a member of SAFF staff, volunteer or anyone else associated with SAFF work in some recognisable capacity is found to have committed acts in relation to children or vulnerable adults which are criminal or which contravene in a serious way the principles and standards set out in this policy, SAFF will refer these to the appropriate authorities and will also take disciplinary and/or any other action which may be appropriate to the circumstances, such as termination of contracts and the ending of volunteering relationships. SAFF has a legal obligation to refer the person being removed from contact with children to any relevant professional bodies.

C. Receiving a concern

Formal concerns should be made in writing or via e-mail to SAFF HR. If a concern is received by telephone or in person, but cannot be dealt with at the time of the conversation, the whistle blower must be made aware of the SAFF CHM including the possibility of making an anonymous concern. The whistle blower decides whether to formally submit a concern or not. Concerns submitted to SAFF will be opened only by the Manager HR. The whistle blower will receive notice of receipt within one week.

D. Recording the concern

Concern will be recorded onto an internal SAFF system. It will have restricted staff access, and will support concerns being logged on receipt, actions tracked and outcomes recorded. The recorded concern for related to a child within 24 hours needs to be submitted to the district Child Welfare Committee. Therefore, the SAFF Concern Handling Mechanism should source the reporting template required by the state authority. The record of sexual harassment at work place needs to also be submitted to the district authority annually. Thus, logging concerns is a legal requirement.

E. Processing the concern

It is the responsibility of the Manager HR to preliminarily assess the type and nature of the concern and recommend the most appropriate course of action to be undertaken. This will be reviewed and approved by the Safeguarding Committee which is also a Concern Handling Committee. Sensitive complaints will be dealt with as per the procedure set forth ahead. The roles and responsibilities of SAFF and partner organizations will be determined at that stage.

As a general rule:

1. Concerns against SAFF staff and associates will be dealt at the level of the head office directly.
2. Concerns against those deployed through SAFF support will be coordinated by the appropriate seconding SAFF entity. The seconding SAFF organization has the primary responsibility to appropriately investigate the complaint while SAFF HO retains the right to oversee the investigation.
3. Concerns that involve SAFF partners that do not have the capacity to process the complaint will be assessed on a case-by case basis. If necessary and when requested by

the concerned partner organization, SAFP will work together with the partner organization in carrying-out the investigation while simultaneously strengthening their internal procedures and capacities to deal with complaints.

4. If a partner organization is unwilling to act upon the concern, SAFP HO will inform the relevant Authority so that the adequate investigation can take place.
5. Concern that involve more than one SAFP partner organization will be coordinated with the relevant SAFP Board. The SAFP Director Projects will assume a facilitating role to assure a transparent, impartial and consistent course of action.

When a concern is handed back to the partner organization, the partner organization will within thirty days report to SAFP on determination of the breaches and action plan, investigation plan and, if needed, request the support of the HO.

F. Sensitive concerns

Sensitive complaints will be immediately referred to the SAFP Founder who will make the first screening and assessment of the complaint and agree the most appropriate course of action. Complaints contemplating allegations of sexual exploitation and abuse will be shared to only with SAFP Project Director, those relating to financial improprieties will also be shared with the SAFP Board. The seriousness of the complaint will determine how the investigation should be conducted. Details will be shared on a strictly need to know basis. No details will be shared regarding the names of the whistle blower, accused, victim, witnesses or whistle blowers.

G. Investigation process

The SAFP Project Director will have the primary responsibility to coordinate the investigation. Investigations will be carried out confidentially and only persons that need to know about the whistle blower will be involved in the process. Complex sensitive concerns will be investigated by external qualified experts from a preselected and verified pool of investigators. The Manager HR will identify the most qualified expert investigator based on the nature of the concern, geographic location and language requirements. Timeframes for completing the investigation vary depending on their complexity. The aim is to conclude it within the shortest reasonable time ideally not exceeding sixty days from receiving the complaint. The final report will be shared with the Director Administration for review and approval. The decision on the type of action to be undertaken at the completion of the investigation process will be taken by the Executive Director or if he is the one accused, by the President of SAFP board. Costs associated with investigations initiated as a result of complaints against SAFP staff and associates will be covered by the HO. Costs associated with investigations initiated as a result of complaints against those deployed through SAFP support mechanisms will be covered by the partner organization(s). Should this not be possible, alternative funding sources will be explored.

H. Communicating outcomes

The SAFP HO will provide feedback to the complainant and those involved in the concern as appropriate. In case of a sensitive complaint, the complainant, unless he is at the same time the victim, has no “right” to know the outcome of the investigation. The SAFP HO will provide the

complainant with the information whether the complaint has been substantiated or that the complaint is not substantiated. No other information or detail will be disclosed.

I. Appeals procedure

All concerns have to be resolved in a satisfactory fashion for both the whistle blower and the organization. If the complainant does not feel satisfied with the outcome s/he can appeal to the SAFP Founder. This can be done in writing, by letter or email.

Annex 4 - Safeguarding Concern Report Form

Confidential

Name of the person affected		Position	Address. Telephone and Email	
Nature of Concern	Violation of Child or Adult	security breach of organization	Other	
Complaint mode (attach evidence)	Telephone/ WhatsApp	In Person	Letter/ e-mail	
Summary of concern				

Information received at (time):

On (date):

Information received by

Name of the Whistle Blower	Position	Address Telephone and Email

This form, along with all relevant documents, should be retained securely and forwarded to the SAFP Manager HR as soon as possible.

Alleged victim/survivor, child, or vulnerable adult

Name	Age	Gender	Address	Phone and email

Name of Parent/Guardian/Carer:

Name	Age	Gender	Address	Phone and email

Person alleged as responsible

Name	Age	Gender	Address	Phone and email

Concern

Record details of allegation(s) or concern(s). If information is given in person, record as precisely as possible what was actually said, the location of the conversation and the identities of persons present. If the space provided is not sufficient please continue on a separate sheet and attach herewith.

Completed by: (signature)

Print name: (in full)

Date:

Actions and Further Information

Record all actions taken, agencies contacted and information/advice received with times and dates. Entries to be signed.

Action Taken

Action Taken By (Name address, phone and email)	Action	Date

Resolution statement

Is the concern addressed adequately? (Yes / No / Maybe / Don't know)

Comments:

Signatures with date

Whistle Blower	Breach rectifier /Person against who complaint was made	Safeguard Representative	Expert Internal	Expert External

Annex 5 - The safeguarding mechanism

Terms of Reference for SAFP Safeguarding Committee

1.1. Background

SAFP as part of an ongoing move to improve accountability towards all those it serves; individuals and communities, and partner organizations, has established a Safeguarding Committee as part of a Concern Handling Mechanism (CHM) that is user-friendly, safe and accessible, but is also simple, efficient and effective and does not create undue burden.

The legal basis of this CHM is the SAFP Safeguarding Policy and Procedure document that is applicable to SAFP staff, board members, volunteers, interns, consultants, contractors, and partner organizations staff. The Safeguarding Committee does not replace individual complaints mechanisms that partner organizations and staff members already have in place. It provides an alternative and complementary channel for managing complaints that can be activated in predetermined circumstances and when certain conditions are met. SAFP recognizes that the primary responsibility to handle complaints remains with partner organizations. Together with the SAFP Manager HR, the Safeguarding Committee is instrumental to ensure that all complaints received will be dealt with according to agreed procedure and guidelines.

1.2. Objective

To support the Manager HR in making appropriate decisions on complaints received through the SAFP CHM, in accordance with agreed procedures and guidelines.

1.3. Composition

The Safeguarding Committee is composed as follows:

1. The Manager HR; 2. One SAFP Board member 3. The SAFP Director Projects 4. Invited specialist (internal) 5. Invited specialist (external).

Invited specialist members of the Safeguarding Committee are nominated by the Executive Director of SAFP in consultation with the Human Resource Manager.

1.4 Responsibilities

The Safeguarding Committee is responsible to

- Review the complaint and approve the course of action proposed by the Manager HR
- Suggest an alternative action if applicable
- Review and approve the final investigation report or seek additional information if applicable;
- Request an independent investigation following reports which are not deemed satisfactory and/or are not reconsidered for revision by the member organization involved;

- Recommend appropriate disciplinary actions, if applicable. The final decision is taken by the Executive Director.

1.5. Confidentiality Members of the Safeguarding Committee are bound to treat all information received with utmost confidentiality. Breach of confidentiality leads to immediate suspension and the application of an adequate disciplinary measure.

1.6. Sensitive complaints

Sensitive complaints follow the strict rule of confidentiality and need-to-know basis. The Safeguarding Committee will provide the partner CHC only the essentials of the complaint i.e. the nature of the complaint, the course of action decided and, when ready, the outcome of the procedure. No details will be shared with the partner CHC regarding the organizations involved, the names of the complainant, accused, victim, witnesses or whistle blowers.

1.4. Meetings

The SAFP HO is responsible to organise the meetings of the Safeguarding Committee. The members of the Safeguarding Committee are required to prioritise their participation in meetings to make sure that complaints are dealt with in a timely manner.

Duration

Safeguarding Committee members are appointed for a duration of two years. They can be renewed for another two years by the SAFP Director Projects in consultation with the Manager HR.

Safeguarding inserts for the Job Description of Manager HR

1.1. Background

SAFP has established a Safe Guarding Committee that has been recommended by the SAFP Safeguarding Policy and Procedure as a channel for managing safeguarding complaints. The Manager HR will be the executive secretary of the Safeguarding Committee and will be in charge of initiating a session when a complaint needs to be reviewed and followed.

1.2. Objective

To ensure that all complaints received through the SAFP Safeguarding Committee are dealt with in a timely and fair manner, in accordance with agreed procedures and guidelines.

1.3. Functional Responsibilities

Under the guidance of the Director Administration

- Receive and acknowledge complaints in a timely manner
- Screen and assess the type and nature of the complaint and recommend the most appropriate course of action to be undertaken
- Coordinate meetings with the Complaints Handling Committee

- Refer complaints relating to sexual exploitation and abuse to the SAFP Executive Director.

Coordinate and facilitate investigations

- Provide feedback to the complainant and those implicated in the complaint as appropriate
- Ensure confidentiality at all times
- Identify external qualified experts to investigate complex sensitive complaints
- Ensure that member organisations to whom complaints are handed back report on the outcomes of the investigation to SAFP in a timely manner
- Set-up an internal complaint recording system, enter and track all complaints received and ensure proper documentation of responses and outcomes are recorded in the system
- Support SAFP partner organisations to strengthen their internal procedures and capacities to deal with allegations of abuse and exploitation
- Ensure that SAFP people, board members, volunteers, interns and contractors are adequately oriented on the Safeguarding Policy and Procedures.
- Identify partner Organisations with Safe Guarding Committee experience to act as champions towards other partners
- Work with SAFP Communications to develop safeguarding messages
- Ensure that information about how and where to complain is kept up to date and available on the SAFP website and social media pages.

1.4 Experience

- Substantial experience in leading on the investigation of complex complaints and drafting high level reports
- At least 5 years' experience in similar position
- Excellent knowledge of the SAFP
- Proven experience in training design and delivery.

1.5. Skills

- Ability to rapidly assimilate a range of complex information and make expert judgements
- High level of accuracy and attention to detail
- High level communications skills
- Ability to deal with conflicting demands ensuring key priorities and deadlines are met through effective time management
- Strong understanding and ability to apply international standards on protection and accountability
- Excellent verbal and written communications skills in English and fluency in a local language is an asset

1.6 Reporting line

Direct: Program Director and to the SAFP Director Projects if the concern is against the line manager. If the complaint is against the Founder SAFP this Concern Handling Officer reports to the President of the Board. The Manager HR as the Concern Handling Officer will have a close working relationship with the SAFP legal advisor.

Annex 6 - Checklist format with an example of vendors checklist

Example: A taxi from our vendor service has been called to visit a location affected by a disaster situation. The taxi that came does not have seat belts and the door does not lock properly. A team of 2 persons (male, female) are nominated to visit a location (some 3 hour drive) to make an assessment of damage. You are head of DRR and time is important:

- What is the potential harm?
- What will be your response?

What should be the response? Go or not go?

If the answer is 'go' then the staff is responsible for their own self in any event and the organization is not responsible. You have to be responsible for your own self and your co travelers and the image of your organization.

What are the potential safeguarding risks here?

Accidents, severity of injury, not cope the disaster etc

How can you reduce the potential risks – immediately and later?

When you enter a taxi there should be a quick screening of essential requirements such as whether the vehicle looks serviced especially when going on long distances and in rugged areas. Some essential requirements in good working condition are having seat belts, first aid kit, fire extinguisher, doors and windows that shut and open smoothly, spare tire air filled, car tools, rope, whether the driver has had substantial duration of rest before taking this drive etc.

This highlights the following safeguarding needs:

- i. A quick checklist (ready reckoner) for travelers to use before entering the vehicle especially on a long drive.
- ii. A decision to be made whether to go or get another vehicle.
- iii. So Immediate action is to call the vendor, give an overview and ask for a replacement. Urgent action needed as the task in hand is assessment in DRR.
- iv. Follow up with a letter reporting the non-compliance issues which was submitted at the time of contracting. The vendor then is also informed that safeguarding is a non-negotiable factor. The contract also covers the consequence of noncompliance.
- v. Hence, a safeguarding checklist, compliance and invalidation process of the contract is to be drawn in agreement with the vendor while selection and detailed in the contract.
- vi. Commitment to compliance monitored through feedback from office staff.
- vii. Reporting to the vendor in writing wherein a warning or termination is furnished.
- viii. Assess gaps or what to strengthen in the system or procedure with the vendor and any change needed in staff behavior.



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