



PARADIGM FOR SOCIAL JUSTICE AND DEVELOPMENT

SAFEGUARDING POLICY

2019

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BACKGROUND OF PSD

Paradigm for Social Justice and Development (PSD) is a women/youth-led and women's rights organisation working to advance social justice, gender equality and poverty eradication in its engagement with marginalised and vulnerable communities. In our work, we specifically seek to secure, promote, protect and safeguard rights of women and girls.

VISION

A Society Without Injustice, Violence and Poverty

MISSION STATEMENT

To work with vulnerable communities to address social injustices, alleviate poverty and violence.

PSD's CORE VALUES:

The organization is committed to:

- Inclusion and non-discrimination
- Transparency and Accountability
- Equity
- Empowerment
- Partnership, Learning and Reflection
- Innovation and Excellence
- Confidentiality

PROGRAMME FOCUS AREAS

PSD's Key programme Focus Areas include: -

- Strengthening Women's Access to Justice
- Peace and Security
- Human Rights and Good Governance
- Economic Empowerment for youth, women and PWDs
- Sexual and Reproductive Health Rights
- Research

INTRODUCTION

This policy aims to safeguard all people who come into contact with PSD through our work in humanitarian and development contexts from abuses of that power and privilege. Paradigm for Social Justice and Development (PSD) places human dignity at the centre of its development work. In our work, we specifically seek to secure, promote, protect and safeguard women and girls rights. We recognise that those working with PSD have increased power and privilege. Safeguarding is at the heart of all our work with children, young people and Adults especially those at Risk.

WHAT IS SAFEGUARDING?

Safeguarding means promoting and protecting people's human rights and wellbeing, and enabling them to live free from harm, exploitation and abuse. A safeguarding approach means identifying and minimizing the risk of harm to children and adults from staff, representatives and partners; our operations and programme

activities including responding appropriately to any safeguarding concerns about children and adults within communities where we work. It entails a wide potential range of policies, procedures and activities seeking to address child and adult safety and wellbeing.

POLICY STATEMENT

PSD places human dignity at the centre of its work. At the heart of PSD's efforts to impact poverty and social justice is its engagement with marginalised communities. In PSD, we also recognise the particular responsibility we have to similarly promote human dignity and social justice within our own organisation and maintain a safe and respectful workplace. We recognise the importance of organisational culture and accountability in creating a safe and supportive organisation for our staff, our partners and the communities with whom we work.

At PSD, we believe all people have a right to live their lives free from sexual harassment, exploitation and abuse, and that no child should be subjected to abuse of any form. We believe that sexual harassment, exploitation and abuse, and child abuse, are more likely to be exerted over particular groups of people due to inequalities and vulnerabilities, particularly those experienced by women, vulnerable adults and children. We recognise that there is unequal power between PSD Employees and Related Personnel and the people we partner and work with throughout our programs, and also between people within our organisation. We expect that our power will not be used to advantage ourselves or cause harm to others.

PSD recognises we have a responsibility to protect people we work with, and who work for us, and we will continuously strive to prevent sexual harassment, exploitation and abuse and child abuse from happening. We take seriously all reports of sexual harassment, exploitation and abuse, and child abuse. Our actions are informed by a survivor-centred approach which means that the needs and wishes of survivors guide our response that survivors are treated with dignity and respect, and the rights of survivors to privacy and support are prioritized.

PSD has a zero-tolerance approach toward sexual harassment, exploitation and abuse, and child abuse. We will carefully examine allegations and investigate, and take appropriate disciplinary action where this is needed, taking into consideration the rights and interests of the survivor, consistent with PSD's survivor-centred approach. We make very clear that sexual harassment, exploitation and abuse, and child abuse in any form, perpetrated by our staff, partners or other related personnel, towards anyone, will not be tolerated.

SCOPE OF THE POLICY

The policy is to be applied across all organizational activities, and used by any member of staff or volunteer working directly with children, young people, and Adults at Risk, and to any other support staff or partner of the organization. However, PSD is unable to enforce the policy with independent, external agencies, such as partner organisations. Where the policy or procedure refers to a 'child' or 'young person' we mean anyone who has not yet reached the age of 18 years. Where the policy refers to an 'Adult at Risk', we mean anyone who is 18 years or older and who is vulnerable.

This policy applies to all PSD Employees and Related-Personnel:

- PSD Employees include all employees, PSD Members, PSD Affiliates and PSD Field Offices;
- Related Personnel includes board members, volunteers, interns, visitors and international and local consultants, in addition to individual and corporate contractors of these entities and related personnel. This includes non-PSD entities and their employees and individuals who have entered into partnership, sub-grant or sub-recipient agreements with PSD, as well as community volunteers and incentive workers¹.

The policy applies both during, and outside, normal work hours. Actions taken by PSD Employees and Related Personnel outside of working hours that are seen to contradict this policy will be seen as a violation of this policy.

Further definitions related to this policy are included in Annex 1.

PURPOSE AND COMMITMENT

The purpose of this policy is to ensure that PSD activities are implemented in a safe and protective environment where harm, exploitation and abuse are effectively prevented as far as reasonably possible, and responded to effectively.

The policy has three specific objectives:

- a) keeping children and adults safe;
- b) safeguarding the reputation of PSD, including guarding PSD's representatives from false allegations or from operating within an unclear framework; and
- c) ensuring the highest standards of behaviour from representatives and minimizing the risk of abusers entering the organization.

PSD is committed to devising and implementing policies so that everyone within the organization accepts their responsibilities for safeguarding children, young people and Adults at Risk from abuse and neglect. This means following procedures to protect them and reporting any concerns about their welfare to the appropriate authorities; PSD commits to;

Organisational Culture, Leadership and Accountability

PSD will make every effort to promote, create and maintain a safe organisational culture for all people who work for and with PSD, including our partners and the communities where PSD works. At all times, it is expected that PSD's leaders will promote PSD's safeguarding values by highlighting the organization's commitment to equality, diversity and respect for others. PSD will create an environment where it is safe to address sexual harassment, exploitation and abuse, and child abuse.

¹ Different considerations will arise regarding the enforcement of some of this policy and the principles for volunteers and incentive workers hired from communities with whom we work. While sexual exploitation and abuse will always be prohibited, as expressly set forth in this policy, discretion may need to be used in the application of the Safeguarding Code of Conduct regarding sexual relationships for this category of worker. See Annex 1 PSD's Safeguarding Code of Conduct.

PSD will develop organization-specific safeguarding strategies, with appropriate levels of dedicated capacity and allocated resources at all levels of the organization, to prevent and respond to sexual harassment, exploitation and abuse, and child abuse.

PSD will ensure high-level oversight and accountability around its safeguarding efforts. We will do this through monitoring and reviewing our safeguarding performance and seeking feedback from PSD Employees and Related Personnel, partners, program participants and communities where PSD works, on the effectiveness of our safeguarding measures. We are committed to continuous learning and improvement to prevent and respond to sexual harassment, exploitation and abuse, and child abuse. We will be accountable and transparent in communicating our efforts and progress to various internal and external audiences, including PSD governance and leadership structures, staff, donors, partners, the wider sector and communities. All information shared will be informed by a survivor-centred approach and risk assessment.

People Management

PSD will seek to employ staff who are aligned with our vision, mission and values, and, in compliance with applicable laws, prevent known perpetrators of sexual harassment, exploitation and abuse and child abuse from being (re)hired or (re)deployed. We will incorporate appropriate job responsibilities in leadership, managers and other staff positions. Managers and Human Resource teams will ensure robust recruitment screening processes for all personnel, particularly for personnel who will have any direct or indirect contact with children and/or vulnerable adults. We may include in performance management/ feedback processes of senior managers, the adherence to create and maintain an environment which promotes this policy and Safeguarding Code of Conduct and to prevent sexual harassment, exploitation and abuse, and child abuse.

PSD will ensure all personnel are aware of our Safeguarding Policy, our expected behaviours and conduct, and how to report wrongdoing by incorporating PSD's expectations on the prevention of sexual harassment, exploitation and abuse, and child abuse in relevant codes of conduct, new employee orientations, awareness raising training and refresher courses, and through regular internal communications.

Partners

PSD will promote and require safeguarding with partners. PSD will ensure adequate safeguarding assessments as part of due diligence processes when considering new and existing partnerships. We will choose our partners based on their commitment to social justice and equality, their organisational values, and how they safeguard their staff and program participants, as well as on their suitability to deliver the work we require of them.

We will ensure that when engaging in partnerships, sub-grant or sub-recipient agreements, these agreements:

- a) incorporate this Policy as an attachment or otherwise implement reasonable due diligence and monitoring procedures of its sub-awards consistent with this Policy;

- b) include the appropriate language requiring such contracting entities and individuals, and their employees and volunteers to abide with a Code of Conduct that is pursuant to the standards of this Policy; and
- c) expressly state that the failure of those entities or individuals, as appropriate, to take preventive measures against sexual harassment, exploitation and abuse, and child abuse, to investigate and report allegations in a timely manner, or to take corrective actions when sexual harassment, exploitation or abuse, or child abuse has occurred, shall constitute grounds for PSD to terminate such agreements.

We will work collaboratively to build capacity in our respective organisations to achieve our safeguarding commitments. We will respect our partners, sub-grantees and sub-recipients and where possible and necessary, support them in having the skills and capacity to fulfil their responsibilities consistent with this policy. For consultants, independent contractors and the like, PSD may incorporate this Policy as an attachment to any written agreement or otherwise develop a summary of the requirements contained in this Policy and the provisions noted in this section.

PSD will collaborate on safeguarding within the sector, including with communities, other organisations, donors, governments, civil society networks and partners, to advance our practices and contribute to wider efforts to prevent and respond to sexual harassment, exploitation and abuse, and child abuse.

EMBEDDING SAFEGUARDING IN OUR WORK

PSD will undertake safeguarding risk assessments to identify areas of safeguarding and sexual harassment, exploitation, and abuse, and child abuse risks, and document steps that are being taken to remove or reduce these risks.

PSD will incorporate safeguarding measures into programs and throughout the project cycle. We will do this through our collaborative program design approach, including with our partners and program participants, at all stages to produce better design, monitoring and evaluation of safeguarding in our programs. We aim to identify and mitigate, or minimise, risks arising from our programs.

PSD will ensure that multiple mechanisms for reporting sexual harassment, exploitation and abuse, and child abuse are accessible and sensitive to the differing needs of anyone wishing to report, including vulnerable adults and children most at risk of sexual harassment, exploitation and abuse, and child abuse, the communities we work with, our partners, and PSD Employees and Related Personnel. We will involve program participants in the design, monitoring and evaluation of community-based reporting mechanisms. We will include documented reporting procedures in relevant local languages. We will raise community awareness on the expected behaviours of our Employees and Related Personnel and on how to make a report. PSD will ensure that anyone responsible for receiving reports understands how to carry out their duties and handle them in a safe and confidential manner. We will be transparent with survivors around any obligations or actions that may need to be taken as a result of their report, including referral to third parties. All actions will be informed by an assessment of risk to all those involved.

PSD'S SAFEGUARDING CODE OF CONDUCT

PSD's capacity to achieve its vision and mission depends upon the individual and collaborative efforts of all PSD Employees and Related Personnel. To this end, all PSD Employees and Related Personnel must uphold and promote the highest standards of ethical and professional conduct and abide by PSD's policies. This policy defines the safeguarding conduct to be followed by all PSD Employees and Related Personnel to protect anyone, from sexual harassment, exploitation and abuse, and child abuse by PSD Employees and Related Personnel.

This Safeguarding Code of Conduct is intended to provide an illustrative guide for PSD Employees and Related Personnel to make decisions that exemplify PSD's broader Code of Conduct and core values in their professional and personal lives. Any violation of this Safeguarding Code of Conduct is a serious concern and may result in disciplinary action, up to and including dismissal, in accordance with disciplinary procedures and applicable laws. All PSD Employees and Related Personnel must read and sign this Safeguarding Code of Conduct.

RESPONSIBILITIES

All PSD Employees and Related Personnel

All PSD Employees and Related Personnel share an obligation to prevent, report and respond to sexual harassment, exploitation and abuse and child abuse. It is the responsibility of all PSD Employees and Related Personnel to uphold PSD's Safeguarding Policy and Safeguarding Code of Conduct. All PSD Employees and Related Personnel must read this policy and either sign the Safeguarding Code of Conduct or sign a Code of Conduct that is consistent with or references this policy and Safeguarding Code of Conduct.

Supervisors and Human Resource Manager

Supervisors and the Human Resource Manager must ensure that all PSD Employees and Related Personnel understand and comply with PSD's Safeguarding Policy and either sign the Safeguarding Code of Conduct or sign a Code of Conduct that is consistent with or references this policy and Safeguarding Code of Conduct. The Human Resource Manager/recruiting officer is also responsible for robust safe recruitment and induction, whilst Supervisors are responsible for ensuring staff have a thorough awareness and sensitization to this policy and the issues it raises. Supervisors must ensure that all staff with specialised duties towards this policy have the appropriate experience, training and support available to them, including staff responsible for receiving and handling sensitive reports and staff responsible for investigations. Supervisors will ensure performance management of staff, support an accountable and safe organisational culture to prevent sexual harassment, exploitation and abuse, and child abuse.

PSD Executive Director/ Senior Management

PSD Executive Director or representative from Senior Management must provide clear guidance and demonstrate how the organisation, across its operations, will make every effort to protect all people from sexual harassment, exploitation and abuse, and child abuse in the delivery of PSD projects and programs. The Executive Director must ensure that culturally appropriate, safe and accessible, community-based reporting mechanisms are developed, implemented, monitored and reviewed for effectiveness. This

includes awareness-raising with program participants and PSD Employees and Related Personnel about protection from sexual harassment, exploitation and abuse, and child abuse, and how to use the reporting mechanisms. The Executive Director leads PSD's work with partners to ensure appropriate support, assessment, and monitoring of partner commitments in relation to this Policy. The Executive Director will also make every effort to ensure that complaints handling, and investigation procedures are enacted, along with appropriate employee disciplinary procedures as necessary. The Executive Director is responsible for ensuring that good quality and appropriate survivor support services are researched and made available.

PSD Members and Affiliates

PSD Members and Affiliates are responsible for implementation of this policy. PSD Members and Affiliates will ensure this policy is reflected in their own codes of conduct. Members and Affiliates are responsible for defining and appropriately resourcing workplans and procedures to uphold and operationalize this policy as well as monitoring and reporting on performance against this policy utilising standard key performance indicators and methodology. PSD Members and Affiliates must have in place reporting and investigation procedures, and employee disciplinary procedures for their staff. PSD Members will provide the necessary support to the Secretariat to ensure they have in place the necessary staff skills, budget guidance for putting this policy in place, reporting mechanisms, investigations procedures, survivor assistance support, and guidelines for reporting on performance against this policy.

PSD Secretariat

The Secretariat will coordinate oversight of this policy in collaboration with PSD Member focal points, and review and update the policy according to the timeframe specified in the policy. The Secretariat will monitor and report against this policy.

PSD Board

The Boards of PSD are accountable for this Safeguarding Policy and require from leadership regular reports on policy implementation and risks to inform their guidance for the organization.

MEASURES TO IMPLEMENT THE POLICY

The safeguarding policy requires the following steps for its implementation:

- **Staffing**– this will involve designating an officer or officers; and training them such that they acquire the necessary skills and knowledge needed to take on the responsibilities. It will also include building the understanding and capability of the organization required to implement this policy.
- **Prevention measures**– this will include awareness raising training of relevant staff, induction of staff in the policy, and incorporation of the policy into relevant existing systems. All recruitment of staff will include a full induction to the safeguarding policy and code of conduct, including procedures to follow should any safeguarding concern arise.
- **Reporting and responding measures**– this will include steps for alerting and reporting safeguarding concerns, investigation and incident management. PSD will ensure that reporting and incident management procedures to handle safeguarding concerns are in place and effectively used to enable an appropriate and swift investigation of any given case.

- **Implementing and maintaining the policy** – this will include training and capacity building of staff and partners, monitoring, and reviewing the policy. PSD will integrate safeguarding measures into relevant core internal processes and tools such as partner assessments and agreements, training modules, programme design, monitoring and accountability systems and recruitment procedures.

RECRUITMENT PRACTICES

PSD is committed to prohibit recruiting anyone under the age of 18 years. PSD will always try to recruit the most suitable person for any role, ensuring that they respect and value children, young adults, and vulnerable groups and committed to good practice in working with them. Our practices aim to recruit the most suitable candidate to work for our programs.

Recruitment Procedures in Relation to Staff

In relation to the recruitment of staff, the individual line manager recruiting and selecting representatives, PSD must ensure that these procedures are followed. They must read this section carefully as certain procedures (e.g. interview, reference checks, security clearance) will be relevant for these roles.

Development of relevant job descriptions

All positions for PSD have a specific job description. For positions that are directly interacting with community members; the line manager must ensure that they carefully consider the role and the required level of qualification and experience needed to uphold good practice in working with children, young adults and vulnerable groups in the community. The line manager must ensure that the candidates are selected against the set criteria.

Interview and selection

Screening measures must take into selection processes for all staff (local / international), volunteers/interns (local / international). These include various reference checks as per recruitment procedures. Specific interview questions should be asked to explore knowledge, experience and approaches of working with children, young adults and vulnerable groups which is relevant to the role. The test and interview should be based on competency so that the capacity of the staff as per the job description of the required role can be accurately measured and assessed. One question should be relevant to safeguarding to know the knowledge of the candidate on the subject.

Employment shall only be offered to those applicants who possess official identification documents e.g. National Identity Card (NIC) or passport, birth certificate etc and same shall be legally verified before offering employment.

During the selection process of positions working with community members, the line manager must ensure that serious consideration is given to the candidates who have applied for the positions involved in working with children, young adults and vulnerable groups.

IMPLICATION OF NON – COMPLIANCE

PSD has zero tolerance for any form of abuse and exploitation. PSD reserves the right to refuse employment offer to staff (local / international), volunteers/interns (local / international) if they are deemed to pose a risk to any segment of the population that the organization is engaged with.

Similarly, if any consultants / resource persons, Visitors, implementing partners, contractors, suppliers and any other individuals working for or representing PSD are found to be engaged, or suspected of being engaged in any activity that can harm or put on risk of abuse or exploitation will be reported to the relevant authorities or their employer. PSD will take disciplinary action against them such that their names will be blacklisted by PSD.

SAFEGUARDING RISK MANAGEMENT:

Under this policy, PSD will ensure that a Safeguarding risk assessment is part of the Quality and Accountability tool and compliance is ensured through monitoring of the project at field level.

PSD ensures child development and protection through working with partners and stakeholders involved in any activity especially in PSD's Child-Focused Projects. PSD ensures that the voices of children, young adults and vulnerable groups are heard and are incorporated in the projects that are directly related to their interest.

REPORTING

- a) All PSD staff and partners are responsible and obligated to report any suspicions of child or adult beneficiary abuse (or other safeguarding concerns, including any violations of this Policy) that is connected to PSD or its programmes.
- b) All internal and external reports of actual or suspected violations under this policy should be directed to the Office of the Human Resources Manager/person designated with recruitment whose contact details shall be published on PSD's website.
- c) As part of their presentations PSD staff will make their audiences/ constituencies generally aware of this policy and avenue of reporting actual or suspected violations.

Safeguarding Concerns Reporting Processes

Any known or suspected protection concerns must be brought to the attention of Line Manager and/or directly to the Safeguarding Committee member. If a staff reports a concern to their Line Manager, the Line Manager is expected to immediately notify a Safeguarding Committee member. In the event that staff members have concerns related to the behavior of their Line Manager, they should raise these concerns directly with a Safeguarding Committee member.

The Safeguarding Committee member shall immediately notify the Governing Board about the concerns which are serious or most sensitive such as:

- Sexual / Physical Assault
- Sexual assault, Blackmail, Extortion or Physical Abuse Abuse of Authority/Power
- Cases in which very senior management involved

- Cases that become public and/or have legal implications
- Allegations that effect the integrity and functions of the organisation

Timelines for reporting

Safeguarding related complaint mentioned above shall be shared within 24 hours of the incident being recorded.

Updates on investigation shall be shared within 5 days.

Final Decision shall be shared with governing board within a week.

To ensure that all such situations are handled appropriately and effectively, a reporting mechanism has been created:

Complaints related to abuse and exploitation may be lodged through a pre-existing Complaints Response Mechanism in those project areas where it has already been established (Annex 3). Therefore, complaints shall be lodged through this complaint response mechanism and recorded in the log sheet/spread sheet (Annex 5). PSD's Safeguarding Complaints and Response Management Flow diagram (Annex 3) must be followed for reporting protection concerns.

- Safeguarding principles as per donor requirements outlined in project agreements must be followed for prevention reporting and managing protection concerns.
- Regular monitoring will be done by monitoring and evaluation team against the quality and accountability tools related to safeguarding.
- Maximum time for incident reporting investigation shall be 24 hours. Incident can be reported by using Safeguarding Incident Reporting Form (Annex 4)
- Further course of action/investigation report can be made by completing the Safeguarding Investigation Reporting Form (Annex 6).
- All complaints will be recorded on the Complaints Monitoring Log Sheet (Annex 5) and stored ensuring confidentiality and data protection.

All documentation on cases will be stored securely and confidentially and only shared with those involved in working on the case, or the authorities if the need arises.

IMPLEMENTATION AND TRAINING

For the sake of effective and coordinated implementation of this policy, PSD will ensure the following steps:

- PSD's Safeguarding Policy is included in staff orientation package and all new comers will be oriented about this policy. Regular re-orientation / refresher sessions will be conducted for the staff to brief them on the Safeguarding Policy, organizational commitment and job expectations in terms of safeguarding.
- All Program staff is expected to consider PSD's Safeguarding Policy while planning, implementing and monitoring of their projects.
- PSD's Safeguarding Policy is accessible for all staff on PSD's Human Resources Information System (HRIS).

- Using organization systems for any forms of violence, abuse or exploitation such as pornography is strictly prohibited and staff has to report to their immediate supervisor if any of the guidelines are violated by any staff member. PSD procedures on computer, internet, equipment and email usage are outlined in the guidelines for effective use of hardware resources offered by the organization.

Communication Guidelines for interacting with community members specifically with women, children, young adults and vulnerable groups during a project

PSD will ensure the following;

- Acquire permission of child / guardian or adult to use images for publicity / fundraising / awareness (informed consent) as much as possible (Annex 6: Consent Form)
- Let women, children, young adults and vulnerable groups (such as persons with disability and elderly people) give their own accounts as much as possible rather than others speaking on their behalf; highlight ability of women, children, young adults and vulnerable groups to take responsibility and action for themselves by providing and ensuring a protective environment for them
- An accurate and balanced portrayal of women, children, young adults and vulnerable groups, with emphasis on dignity and as much reference as possible to their social, cultural and economic environment
- Balanced portrayal even in cases of survivors of abuse and exploitation (recommended use of before and after images / stories)
- Accurate representation of women, children, young adults and vulnerable groups: avoid manipulation or sensationalizing text and images; laying emphasis on dignity
- Avoid: degrading, victimizing or shaming language and images; making inaccurate generalizations; discrimination of any kind; taking pictures out of context (try to provide informative caption)
- Women, children, young adults and vulnerable groups must be appropriately clothed in images and not in sexually provocative poses
- No personal and physical information to identify location of women, children, young adults and vulnerable groups that could put them at risk to be put on website or on any other communication mediums including brochures, pamphlets and/or social media pages
- Always seek permission before taking photos of women, children, young adults and vulnerable groups except in exceptional circumstances

ACCOUNTABILITY

PSD's safeguarding responsibilities fall on each and every member of the organization. All staff is responsible for ensuring that the activities that they are involved in during the course of their work are carried out in accordance with this policy.

Managers are committed to ensure that this policy is fully communicated and followed by their team members. It is their responsibility to ensure that the activities and services they provide have adequate procedures to protect and safeguard the children, young adults and vulnerable groups.

DISCLOSURE

Whilst PSD maintains appropriate confidentiality for individuals in Safeguarding Incidents, PSD may disclose information about incidents, when lawfully permitted, in order to support prosecution of suspected criminal activity, support learning and accountability, advocate to prevent future incidents, or as required by law. Information in ongoing investigations of Safeguarding Incidents, and information about past incidents, is shared only with those on a 'need-to-know' basis, as deemed necessary by PSD. If it is likely that sensitive information about survivors or about violence against children or adults will not be kept confidential, and would put people at risk if accessed by unauthorised parties, such information is not collected. Detailed personal information, in particular health information, is not obtained or maintained by PSD, except for the minimum necessary to ensure PSD handles the matter appropriately. Such personal data is kept strictly confidential and protected in accordance with the applicable data protection and informational security standards.

REVIEW OF THE POLICY

The policy will be reviewed when need arises, or in the following circumstances:

- Changes in legislation and/or government guidance.
- As a result of any other significant change or event.

PSD's safeguarding policy and procedures are widely promoted to ensure that all people to whom this policy applies, are aware of the requirements mandated under this policy and have access to the policy when needed. Failure to comply with the policy and procedures will be addressed without delay and may result in dismissal/exclusion from PSD activities.

Guidance and Reference:

The policy should also be read in conjunction with the following documents:

- Annex 1: Definitions
- Annex 2: Safeguarding Code of conduct
- Annex 3: Complaints and Response Management Flow Diagram
- Annex 4: Safeguarding Incident Reporting Form
- Annex 5: Complaint Monitoring Log Sheet
- Annex 6: Safeguarding Investigation Reporting Form
- Annex 7: Consent Form

Signed for and on behalf of the PSD by



**CHAIRPERSON,
BOARD OF DIRECTORS
PSD**

ANNEX 1: DEFINITIONS AND INDICATORS OF ABUSE

Universal Declaration of Human Rights, UN Convention on the Rights of the Child, Convention on Exploitation and The Convention on the Elimination of all Forms of Discrimination Against Women and UNCRC covers the issue of abuse, neglect and exploitation.

There are four main categories of abuse and neglect: physical abuse, emotional abuse, sexual abuse and neglect. Each has its own specific warning indicators, which we should be alert to.

1. **Physical abuse:** A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a children, young adults and vulnerable groups. Physical harm may also be caused when a parent or care taker fabricates the symptoms of, or deliberately induces, illness in children, young adults and vulnerable groups.

2. **Emotional abuse:** The persistent emotional maltreatment of children, young adults and vulnerable groups such as to cause severe and persistent adverse effects on the children, young adults and vulnerable groups' emotional development. It may involve conveying to children, young adults and vulnerable groups that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person. It may include not giving the children, young adults and vulnerable groups opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children, young adults and vulnerable groups. These may include interactions that are beyond children, young adults and vulnerable groups developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the children, young adults and vulnerable groups participating in normal social interaction. It may involve seeing or hearing the ill- treatment of another. It may involve serious bullying (including cyber bullying), causing children, young adults and vulnerable groups frequently to feel frightened or in danger, or the exploitation or corruption of children, young adults and vulnerable groups. Some level of emotional abuse is involved in all types of maltreatment of children, young adults and vulnerable groups, though it may occur alone.

3. **Sexual abuse:** Involves forcing or enticing children, young adults and vulnerable groups to take part in sexual activities, not necessarily involving a high level of violence, whether or not the children, young adults and vulnerable groups are aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children, young adults and vulnerable groups in looking at, or in the production of, sexual images, watching sexual activities, encouraging children, young adults and vulnerable groups to behave in sexually inappropriate ways, or grooming children, young adults and vulnerable groups in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children and vulnerable adult. Sexual exploitation is a form of sexual abuse where children, young adults and vulnerable groups are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In

some cases, children, young adults and vulnerable groups or women are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Children, young adults and vulnerable groups sexual exploitation doesn't always involve physical contact and can happen online. A significant number of children and vulnerable adults, women or girls who are victims of sexual exploitation go missing from home, care and education at some point. Indicators of sexual exploitation include children, young adults and vulnerable groups who:

- Appear with unexplained gifts or new possessions.
- Associate with other young people involved in exploitation.
- Have older boyfriends or girlfriends.
- Have sexually transmitted infections or become pregnant.
- Misuse drugs and alcohol.
- Go missing for periods of time/ regularly come home late/absent from school without explanation.

4. **Neglect:** The persistent failure to meet children, young adults and vulnerable groups' basic physical and/or psychological needs, likely to result in the serious impairment of the child or vulnerable adult's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child and vulnerable adults is born, neglect may involve a parent or care taker failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- Protect children, young adults and vulnerable groups from physical and emotional harm or danger;
- Ensure adequate supervision (including the use of inadequate care-givers); or
- Ensure access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to, a children, young adults and vulnerable group's basic emotional needs.

UNCRC Article 19 covers the issue of neglect.

Radicalization: The process by which people come to support terrorism and extremism and, in some cases, to then participate on terrorist activity. Extremism is the demonstration of unacceptable behavior by using any means or medium to express views which:

- Encourage, justify or glorify terrorist violence in furtherance of particular beliefs
- Seek to provoke others to terrorist acts
- Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
- Foster hatred which might lead to inter-community violence.

Child/Young Person

A child or young person means someone who is under 18 years of age, that is, has not reached their 18th birthday. For PSD, this could refer to the child/young person we are working with directly, or the child of one of these young persons, or of another person, with whom we are in contact in the course of our work. When concerns are raised about the child of a service user (child or vulnerable adult), the needs of the youngest takes precedence.

Adult at Risk

This policy applies to any 'Adult at Risk', defined by the following:

Any person aged eighteen or over who –

- Is or may be in need of community care services by reason of mental or other disability, age or illness; and
- Is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

ANNEX 2 - PSD's Safeguarding Code of Conduct

PSD's capacity to achieve its vision and mission depends upon the individual and collaborative efforts of all PSD Employees and Related Personnel. To this end, all PSD Employees and Related Personnel must uphold and promote the highest standards of ethical and professional conduct and abide by PSD's policies. The Safeguarding Policy, and this Safeguarding Code of Conduct, define the safeguarding conduct to be followed by all PSD Employees and Related Personnel to protect anyone, from sexual harassment, exploitation and abuse, and child abuse, by PSD Employees and Related Personnel.

This Safeguarding Code of Conduct is intended to provide an illustrative guide for PSD Employees and Related Personnel to make decisions that exemplify PSD's broader Code of Conduct and core values in their professional and personal lives. Any violation of this Safeguarding Code of Conduct is a serious concern and may result in disciplinary action, up to and including dismissal, in accordance with disciplinary procedure and applicable laws. All PSD Employees and Related Personnel must read and sign this Safeguarding Code of Conduct².

As a PSD Employee or Related Personnel, I will –

1. create and maintain a safe and equitable organisational culture that prevents and opposes sexual harassment, exploitation and abuse, and child abuse.
2. treat everyone with dignity and respect and challenge attitudes and behaviours that contravene the PSD Safeguarding Policy and Safeguarding Code of Conduct.
3. immediately report any concerns I have regarding possible violations of the PSD Safeguarding Policy or Safeguarding Code of Conduct, whether by a PSD Employee or by Related Personnel. I understand that failure to report any concerns may lead to disciplinary action. I will ensure I am aware of the options available to me to report and that when I report a concern or allegation, I will do so confidentially.
4. share sensitive information I may be aware of that relates to concerns of sexual harassment, exploitation and abuse or child abuse, whether involving staff, program participants or others in the communities where PSD works, through the reporting options available to me. I understand that for respect, dignity and safety of everyone involved, it is essential that I maintain confidentiality about any concerns or information I am aware of and only share information with staff of the appropriate function who need to know such information. I am aware that breach of this policy may put others at risk and will therefore result in disciplinary procedures.
5. disclose to PSD any civil judgment or criminal conviction that relates to allegations made against me of sexual harassment, exploitation or abuse of anyone.
6. always make sure I have another adult present when working with children.
7. always ensure that for work-related purposes when I photograph or film a child, I:
 - comply with local traditions or restrictions for reproducing personal images,

² Employees and individuals that have entered into partnership, sub-grant or sub-recipient agreements with PSD may instead sign their employer's code of conduct and standards if they are generally consistent with these standards.

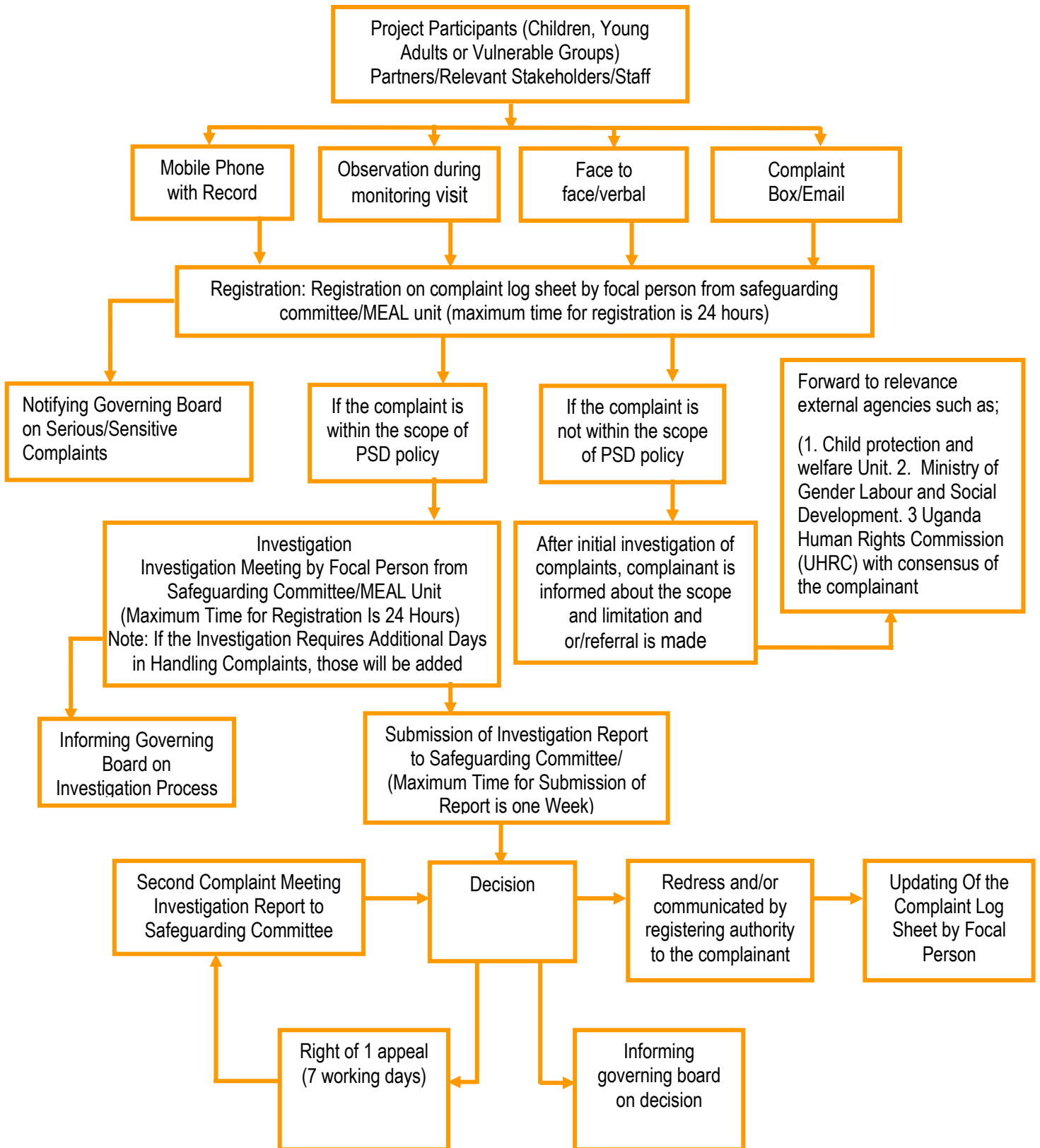
- obtain informed consent from the parent or guardian of the child, before photographing or filming a child, explaining how the photograph or film will be used,
 - ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner,
 - ensure children are adequately clothed and not in poses that could be seen as sexually suggestive,
 - ensure images are honest representations of the context and the facts, and
 - ensure file labels do not reveal identifying information about a child, for example, name and exact location.
8. protect, manage and utilise PSD human, financial and material resources appropriately and will never use PSD resources, including the use of computers, cameras, mobile phones or social media, to exploit, groom or harass participants of PSD programs, children or others in the communities in which PSD works. I am aware that this means that it is prohibited for staff to access, display or transmit offensive and/or pornographic material on any PSD-provided or subsidized electronic device (e.g. computer, tablet, phone) at any time, or on any personal electronic device on a PSD network in the workplace.

As a PSD Employee or Related Personnel, I will not –

1. sexually harass, exploit or abuse anyone and understand that these behaviours constitute acts of gross misconduct and are therefore grounds for disciplinary action, up to and including dismissal.
2. engage in any form of sexual activity or develop physical/sexual relationships with children (persons under the age of 18) regardless of the age of consent. I understand that ignorance or mistaken belief in the age of a child is not a defence.
3. exchange money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. I understand this means I must not buy sex from anyone at any time, or exchange assistance that is due to programme participants / beneficiaries for sex.
4. engage in any sexual activity or sexual relationship with program participants/ beneficiaries. I am aware that such relationships are prohibited. I understand that such relationships are based on an improper use of my position and inherently unequal power dynamics and may undermine the credibility and integrity of PSD's work. I understand I must declare any previously existing relationships with programme participants/ beneficiaries to my line manager or HR manager. I will seek guidance on this prohibition from appropriate management.
5. request any service or sexual favour from participants of PSD programs, children or others in the communities in which PSD works, and will not engage in sexually harassing, exploitative or abusive relationships.
6. support or take part in any form of sexually exploitative or abusive activities, including, for example, child pornography, trafficking of human beings or child marriage.

7. hire children for domestic or other labour, which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities or which places them at significant risk of injury or exploitation.
8. use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.

ANNEX 3: COMPLAINTS AND RESPONSE MANAGEMENT FLOW DIAGRAM



ANNEX 4: INCIDENT REPORTING FORM

(To be filled by complainant /Safeguarding Focal Person either with or without the complainant)

Your Details
Name: _____
Employer's Name: _____ Designation: _____
Capacity in which child /vulnerable adults is known to you: - _____
About the Child/Vulnerable adult
Name: _____
Age/DOB: _____ Gender: _____
Address: _____
In case of child (whom does the child live with (e.g. household structure/ caretaker) _____ _____
Any other Information: _____ _____ _____
Details of Concern/Suspicion/Incident:
How did you come to know about the incidence? KEEP FACTUAL. (Details of what happened, including time, dates, names of others involved, behaviour or physical signs observed, details of possible perpetrator: Note: Please do continue on a separate sheet if required. _____ _____ _____ _____
Details of any conversation with the child or adult or other informant: (Write down exactly what the child/vulnerable adult said and what you said (or another informant said. Remember, do not lead the child/vulnerable adult – record actual details. Please do continue on a separate sheet of paper if necessary) _____ _____

Have you contacted anyone already about this concern: (e.g. Family member, Parents, Care Taker, Line Manager, Co-worker, Safeguarding Focal Person or agencies etc...) If YES then please provide a detail such as: time, date of reporting and person to whom report was made.

Advice given by that person (If any):

Any action you may have taken so far:

Undertaking: I can confirm that to the best of my knowledge the information provided above is correct, and that I will be available to answer any further questions on this matter.

Signed: _____ Date: _____

Note: Please fill out as much information as possible and submit it to the Safeguarding Focal Person immediately. Please remember that all information contained in this report must be kept confidential and must not be revealed to anyone except the person you reported to. PSD cannot absolutely guarantee protection of the person reporting, but will do everything within its power to protect them. You will be informed of next actions that will be taken.

ANNEX 5: PSD COMPLAINTS LOG SHEET

PSD - Complaints Log Sheet													
S/No	Date of Registration	Project Participants (child & adults) Partners/ Relevant Stakeholders/s taff	Receiving Channel 1.Phone with recording 2. Observation during monitoring. 3. Face to face/verbal. 4. Complaint box/email	Description	Analysis		Decision		Response		Redress	Referral	Complaint Closing/App eal Date
					Y	N	Y	N	Y	N			

6- Which external agencies (if any) have been informed?

7- What action has been taken by external agencies (if any) to date?

Reported by: _____ Date: _____

Reviewed by: _____ Date: _____

ANNEX 7: CONSENT FORM TO USE MY INTERVIEWS AND PHOTOGRAPH

I, the undersigned, _____ residing at _____

by full consent and enjoying all legal capacities, acknowledge the following:

1. I hereby irrevocably and unconditionally give my consent to being filmed and/or photographed by _____ for Paradigm for Social Justice and Development (PSD), to film and/or to photograph on this ____ day of _____ 202__ at _____.
2. Please check one of the following:
 - I hereby give consent to the use of the footage and/or images depicting me (the Footage/Photos) but without any other personal identifiers including my name; or
 - I hereby give consent to the use of the footage and/or images depicting me (the Footage/Photos) and my name and all other personal identifiers
 - I hereby consent to the use of my interviews (written or audio) but without any without any other personal identifiers including my name; or
 - I hereby consent to the use of my interviews (written or audio) but without any and my name and all other personal identifiers
3. I understand that I will not receive compensation for the use of the Footage/Photos in any form.
4. I acknowledge that all right, title and interest, including copyrights, in the Footage/Photos shall be vested exclusively in PSD, and I shall without further consideration assign, whether as works for hire or otherwise, the same to PSD. PSD shall have the exclusive and perpetual right to exploit the Footage/Photos by any means or methods now known or hereafter devised for the full period of copyright and any and all extensions and renewals thereof and thereafter insofar as possible in perpetuity, without payment being due to me in respect thereof. The foregoing shall include but not be limited to the sharing of the Footage/Photos/material with other companies, persons or groups that partner with PSD to promote PSD's Mission and Vision.
5. I release and discharge PSD from any and all claims and demands that may arise out of or in connection with the use of the Footage/Photos/materials, including without limitation any and all claims for libel or violation of any right of publicity or privacy.

I am of adult age and have every right to contract with PSD. I have read, or I have been read, this consent before signing it. I understand this consent.

Read and approved and signed by: _____

Print name: _____ Date (DD/MM/YYYY): _____

