



SAFEGUARDING POLICY

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Safeguarding Policy

1. Policy Statement

1.1 Human Appeal takes a 'zero-tolerance' approach to abuse and exploitation of vulnerable people, and holds clear recognition that vulnerable people are at the heart of our work. We also recognise that safeguarding is everyone's responsibility and that we have an obligation to put in place reasonable measures to ensure, as far as possible, the safety and wellbeing of vulnerable people with whom we work, and those within the communities we seek to help, as well as our own people who may become vulnerable.

1.2 Safeguarding is the responsibility that Human Appeal has, to ensure that our employees and volunteers, partners, vendors, operations and programmes do no harm to children, young people or vulnerable adults (together referred to as 'vulnerable people' under this policy); that they do not expose them to the risk of abuse, harm, neglect, exploitation or discrimination; and that any concerns the organisation has about the safety of vulnerable people within those communities in which we work, are dealt with and reported to the appropriate authorities.

1.3 Child protection is a core part of, but not separate to, safeguarding. It is the process of protecting individual children identified as either suffering or at risk of significant harm caused by the external environment as a result of abuse or other acts, influences or omissions. It also includes measures and structures designed to prevent and respond to abuse.

1.4 Over recent years, there has been increasing recognition of the way in which children, young people and vulnerable adults can be at risk of abuse, harm, neglect, exploitation or discrimination by those who are in positions of trust and power over them, including where an organisation is providing humanitarian relief to vulnerable people. Consequently, like any other humanitarian relief or development organisation, we must be proactive to ensure that no harm results from our work activities nor from the contact with beneficiaries and stakeholders that our employees, volunteers and other representatives have in relation to their work on behalf of Human Appeal.

1.5 The humanitarian work that Human Appeal is engaged in requires many employees, volunteers and others working for and on behalf of Human Appeal to engage with children, young people and vulnerable adults, either directly or indirectly, in the provision of that relief work and in the establishment of self-sustaining development programmes, as a means of bettering the lives of those vulnerable people.

2. Human Appeal applies the following key principles to protect its beneficiaries and staff

- 2.1 Everyone has an equal right to protection from abuse and exploitation regardless of age, race, sex, sexual orientation, marriage and civil partnership, pregnancy or having a child, gender reassignment, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- 2.2 The best interests of the vulnerable person are paramount and shall be the primary consideration in our decision making.
- 2.3 We will take responsibility to meet our obligations regarding our duty of care towards vulnerable people, and take action where we believe that a child, vulnerable adult or staff is at risk or respond with appropriate rigour when a vulnerable person has actually been harmed.
- 2.4 A crucial component of safeguarding is the mandatory training of all HA staff on safeguarding and related policies. We will ensure that employees and volunteers are inducted in our Safeguarding Standards and procedures as a key part of the recruitment and on boarding process, and receive regular briefings and refresher training to maintain their awareness of the subject matter.
- 2.5 We will ensure that all partner organisations are informed of how Human Appeal manages safeguarding and take all reasonable steps to ensure that they operate in compliance with our safeguarding standards. When working with or through partners or subcontracted agencies, Human Appeal will ensure that their safeguarding procedures are consistent and in line with the principles and approaches set out in this policy.
- 2.6 We recognise that an element of safeguarding risk will exist within our work, and while we may never be able to totally remove this, we need to do all we reasonably can to reduce it or limit its impact. We require our people to maintain their awareness and watchfulness for signs of any safeguarding issue, and to raise it within our reporting procedures so that responsive action can be taken.
- 2.7 We respect confidentiality and have a responsibility to protect sensitive personal data. Information should only be shared and handled on a 'need to know' basis, that is, access to the information must be necessary for the conduct of one's official duties. Only individuals who have legitimate reasons to access the information are allowed to receive it.
- 2.8 Human Appeal seeks always to work in ways which are culturally sensitive and that respect the diverse nature of the people we work with. We recognise that there are many different ways of thinking, and taking care of vulnerable people and making sure they are protected. It is acknowledged that protecting these groups of individuals and being culturally sensitive can be a difficult balancing act, especially given the situation in many of the countries where we work. As an international organisation, we endorse the United Nations Convention on the Rights of the

Child general principle, that all the rights guaranteed by it must be available to all children without discrimination; and its Article 19 which accords equal rights to protection for children from abuse. Every child matters everywhere in the world. Culture must not be used as an excuse to abuse children, young people or vulnerable adults.

3. Policy Objectives

3.1 To provide clarity to everyone who works for, on behalf of, or in partnership with Human Appeal on how they should engage with children, young people and vulnerable adults.

3.2 To help us make sure that employees, volunteers and other representatives who will interact with children, young people and vulnerable adults, are themselves protected and supported in such activities.

3.3 To help us to have a common understanding of safeguarding issues, develop good practice across the diverse and complex areas in which we operate and thereby increase accountability in this crucial aspect of our work; and,

3.4 To equip HA staff to recognise safeguarding issues and to be able to respond appropriately.

4. Human Appeal Safeguarding Cycle



HA safeguarding cycle begins with identification of abuse/risks through different signs. This is a key responsibility for all staff and other HA representatives. HA has internal assessment mechanisms to prevent harm from happening, including safeguarding checklist, risk assessment done at different phases of project implementation.

Reporting is key and is everyone’s responsibility. No staff is allowed to conduct investigations of any kind apart from the designated individuals. Reporting of all safeguarding concerns needs to be performed urgently and all concerns are to be taken seriously and treated with a high level of confidentiality. Qualified internal investigators are responsible in conducting administrative investigations. The investigation cycle finally helps the organization to draw conclusions, lessons, identify gaps for learning and improving the programs.

5. Definition of Terminology

Abuse/harm	A violation of an individual’s human and civil rights by any other person or persons. It can take the form of physical, psychological, financial or sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the health, survival, development or dignity of a child, staff or vulnerable adult, or by failing to act to prevent harm. Abuse can be a single act or repeated acts and can be unintentional or intentional.
Safeguarding	Keeping the children, staff and adults we work with safe from intentional or unintentional harm caused by programmes or people contracted or linked to HA. Responsibility sits with you as individuals, and collectively across the organisation through the internal policies and procedures. Safeguarding aims at promoting welfare of beneficiaries, staff and protecting the image of the organization.
Child	HA adopts the internationally recognized definition provided in the 1989 UN Convention on the Rights of the Child, to include “every human being below the age of eighteen (18) years. In all cases, HA prohibits its personnel to engage in sexual activity with a person under the age of 18, regardless of the age of majority in any local context, due to different social, cultural or religious reasons.
Child Exploitation	Can include forced marriage, domestic servitude such as cleaning, cooking, forced labour in factories or agriculture, criminal activity such as

	pickpocketing, begging, transporting of drugs, selling stolen property or forgeries, or bag theft.
Child Sexual Exploitation	A type of sexual abuse in which children are sexually exploited for money, power or status. Children of young people may be tricked into believing that they are in a loving, consensual relationship. They may be invited to parties and given drugs or alcohol, or they may be groomed online. Some children and young people are trafficked into or within a country for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.
Discriminatory abuse	Abuse motivated by a vulnerable person’s age, race, nationality, sex, sexual orientation, disability, or other personal characteristic.
Financial or Material abuse	Includes theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
Neglect	The persistent failure to meet a vulnerable person’s basic physical and/or psychological needs, likely to result in the serious impairment of his/her health or development. Examples include failure to provide adequate food, clothing and shelter, failure to protect them from physical or psychological harm or danger; failure to ensure adequate supervision (including the use of inadequate care-givers); or failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a vulnerable person’s basic emotional needs.
Physical Abuse	Includes hitting, beating, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm, misuse of medication etc.
Psychological Abuse	Includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks. Examples include not giving a vulnerable person opportunity to express their views or deliberately silencing them. It may involve bullying (including cyberbullying), or the exploitation or corruption of a vulnerable person.
Sexual Abuse	Involves forcing, enticing or coercing someone to take part in sexual activities, whether or not the vulnerable person is 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 kissing, rubbing and

	touching outside of clothing. They may also include non-contact activities, such as involving a vulnerable person in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse can be carried out by adults or other children.
Sexual Exploitation	Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. Includes profiting momentarily, socially, or politically from sexual exploitation of another.
Sexual Abuse	The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. Under UN regulations, all sexual activity with someone under the age of 18 is considered to be sexual abuse.
Sexual Harassment	A continuum of unacceptable and unwelcome behaviours and practices of a sexual nature that may include, but are not limited to, sexual suggestions or demands, requests for sexual favours and sexual, verbal or physical conduct or gestures, that are or might reasonably be perceived as offensive or humiliating.
Protection from Sexual Exploitation, Abuse, and Harassment	A term used by the UN and NGO community to refer to measures taken to protect children and vulnerable adults from sexual exploitation and abuse by their own staff, representatives and associated personnel. Harassment is included to broaden the range of harmful behaviours violating the rights and dignity of individuals.
Child	Anyone under the age of 18 years, irrespective of the age of majority in the country in which the child lives or in their home country. It is widely recognised that children are generally more vulnerable to abuse and exploitation due to factors such as age, gender, social and economic status, developmental stage, and dependence on others.
Vulnerable Adult	A person, 18 years of age and above, who by reason of disability, age, gender, social and economic status, political instability or illness, or the context they are in, may be unable to take care of or to protect him or herself against abuse, harm or exploitation.

Beneficiary	Someone in receipt of assistance. Alternatively referred to as a member of the affected/vulnerable population, person we seek to assist, person affected by crisis.
Case Management	Following the appropriate policies and procedures to determine the outcome of a report or an investigation of any safeguarding complaint.
Protection	The prevention of, and response to abuse, neglect, exploitation or violence against a child. It also describes the work being undertaken to strengthen laws, policies and systems that are designed to protect children and the entire society.
Code of Conduct	An agreement on rules or behavioural performance for a group or organisation. HA has its own internal Code of Conduct that applies to all staff, and any failure to observe that Code of Conduct may result in disciplinary action being taken, up to and including dismissal.
Complainant	An individual making a complaint, including a survivor of sexual exploitation, abuse or harm, or someone becoming aware of some wrongdoing or concerned about some possible wrongdoing.
Complain Mechanism or procedure	Processes which allow and encourage individuals to report a complaint or concern that is, or could be, a breach of Human Appeal’s policies or Code of Conduct. A mechanism could include an internal post-box, a whistleblowing policy, or a designated focal point.
Confidentiality	The restriction of access to, and dissemination of, information. Confidentiality helps to create an environment in which people are more willing to disclose or provide information, and this helps to build trust in the system and the organisation.
Disclosure	The moment when a child, staff or vulnerable adult tells a responsible adult about the abuse they have suffered or are suffering.
Safeguarding Complaint	A specific concern raised by someone who has witnessed or experienced a failure by Human Appeal or its representatives to meet its values, Code of Conduct or organisational policies, and/or been alerted to such malpractice by others.
Whistleblowing	An organisational policy which aides and supports staff in reporting specific concerns or suspicions of misconduct or malpractice by colleagues.

Staff	In the context of this Policy, the term ‘Staff’ shall be taken to include full time/part time, international/national, short term/long term contracts (including employees, volunteers, and consultants).
Whistle-blower	A person who reports a concern in an anonymous way.
Do No Harm	The concept developed by humanitarian agencies to avoid unintended negative consequences for affected persons and not undermine communities’ capacities for peace building and reconstruction.
Informed Consent	Voluntary agreement of an individual who has the capacity to take a decision, who understands what they are being asked to agree to, and who exercises free choice.
Survivor/Victim	‘Survivor/victim’ refers to a person who is, or has been, exploited or abused, including through sexual exploitation or abuse. ‘Victim’ is a term often used in the legal and medical sectors, while the term ‘survivor’ is generally preferred in the psychological and social support sectors because it implies resiliency.
Sexual Misconduct	A general term that refers to unwanted abuse that is sexual in nature, encompassing sexual abuse, sexual harassment, and criminal exploitation.
Good Faith	Means where a disclosure is made with honest intentions and without malicious reasons.
Malicious Reporting	Reporting with the intention of causing harm normally such reports will be false.
Visitor	A range of persons who are visiting our offices or programmes and may come into contact with children, staff and vulnerable adults through a HA Entity, including journalists, media, researchers, visiting sponsors and influencers.
Survivor-Centred	A particular approach in receiving and responding to reports of harm and abuse. A survivor-centred approach is integral to human and child rights approaches: it prioritises the rights, needs and wishes of the survivor.
Risk Assessment	A methodology used to review a hazard, how it may cause harm, and determine the probability of occurrence of harm and the severity of that harm.
Subject of Concern (SOC)	A person who is alleged to have breached HA policies.

6. Scope

6.1. This policy applies to all staff working for Human Appeal, encompassing trustees, directors, employees, consultants, volunteers and also those persons working for contractor and partner organisations on behalf of Human Appeal.

6.2. This policy demonstrates how Human Appeal meets its legal obligations and reassures employees, partners and members of the public:

- on what they can expect Human Appeal to protect and safeguard vulnerable people;
- that they are able to safely voice any concerns through an established procedure;
- that all reports of abuse or potential abuse are dealt with in a serious and effective manner;
- that there is an efficient and robust recording and monitoring system in place;
- that employees, consultants, volunteers, subcontracted agencies and partners receive appropriate induction on safeguarding;
- that a rigorous ‘safe’ recruitment procedure is in place; and,
- that specific, safeguarding-focused procedures are in place that apply to those that work or have contact with, either directly or indirectly, children, young people or vulnerable adults.

6.3. This policy constitutes Human Appeal’s global policy. Whilst it is recognised that local legislation may vary from country to country, this policy identifies our minimum standards and may exceed the requirements of local legislation. Any development of local policy will be based on this Policy.

7. Types of abuse according to Safeguarding Policy

<p>Physical abuse</p>	<p>An actual or potential harm causing to your body</p> <p>Examples: hitting, shaking, burning, poisoning, drowning, suffocating, and torture.</p>
<p>Psychological/emotional</p>	<p>Failure to provide supportive environment and/or actions that harm emotional development.</p> <p>Examples: bad name calling, constant criticism, belittling, persistent shaming, humiliating, degrading treatment, bullying and isolation.</p>
<p>Neglect</p>	<p>This includes but is not limited to failing to provide adequate food, sufficient or seasonally appropriate clothing and /or shelter. Neglect is also failing to prevent harm; failing to ensure adequate supervision; failing to ensure access to appropriate medical care or treatment or providing inappropriate medical treatment (e.g. administering medication when not authorized); or failing to provide a safe physical</p>

	environment (e.g. exposure to violence, unsafe programming location, unsafe sleeping practices, releasing a child to an unauthorized adult, access to weapons or harmful objects, failing to child-proof a space that children will occupy etc.). It can also be HA staff, consultants, volunteers, partners, contractors and sub-grantees failing to apply minimum requirements as set out in mandatory procedures.
Exploitation	Use of children or vulnerable adult for someone else’s advantage, gratification of profit often resulting in unjust, cruel and harmful treatment of children.
Sexual Misconduct	This is a term that refers to a category of abuse that are sexual in nature. HA has zero tolerance towards all forms of sexual Exploitation and Abuse and sexual harassment and takes seriously all concerns and complaints about SEAH by HA personnel. HA is dedicated to the rigorous investigation of complaints that indicate a possible violation of this policy and will take appropriate disciplinary action, as found necessary, including termination of employment.
Unsafe Programming	Deals with ensuring programs are designed and implemented through safeguarding lens to prevent any harm by program activities and/or abuse from staff/representatives. A programme, activity or event that is not safe for children, staff and vulnerable adults puts the organizations at risk. Examples of unsafe program: <ul style="list-style-type: none"> • Allowing staff to have unsupervised, or unseen/unheard contact with children in our programme; • Failing to secure sensitive children’s data; • Failing to secure site safety – for example, leaving construction sites open with dangerous equipment accessible to children; • Failing to conduct risk assessments and put mitigation actions in place; • Setting up WASH facilities in an unsafe area; for example, unlit locations – risk of sexual abuse.

HA Safeguarding Policy serves to align the organisation’s programmatic goals and visions with these key global declarations as well as commitments.

- The Inter Agency Standing Committee on Prevention of Sexual Exploitation and Abuse
- IASC Six Core Principles (2002; updated 2019)
- Secretary-General’s Bulletin (2003) (“Special Measures for Protection from Sexual Exploitation and Abuse” (ST/SGB/2003/13)

As an agency committed to the Core Humanitarian Standard of Quality and Accountability (CHS) and accountability to communities, Human Appeal also adheres to CHS Alliance PSEAH Handbook to prevent programmes from potential sexual exploitation, abuse or harassment by staff against communities and people affected by crisis across all categories.

HA recognises that the local legislation in some countries of operations may vary, however our safeguarding policy identify minimum standards that may exceed the requirements of local laws but must be adhered to where they do not conflict with local law. For example, HA activities within the United Kingdom adhere to the UK’s Worker Protection (Amendment of Equality Act 2010) Act 2023. We further recognise that states have the primary responsibility of protecting the human rights of all persons within their territories.

8. Accountability for implementing safeguarding policy (Roles and Responsibilities).

All HA employees share an obligation to demonstrate the highest standard of behaviour and conduct towards beneficiaries and fellow staff in their private and professional lives. All staff are obliged to prevent, report and respond to sexual harassment, exploitation and abuse, physical and emotional abuse, neglect, and child abuse. It is the responsibility of all HA employees to uphold HA’s Safeguarding Policy and Code of Conduct during and outside their work hours, to read, understand and adhere to this Safeguarding Policy.

All HA employees within the scope of this Policy **WILL:**

- Undertake mandatory safeguarding trainings and refresher courses;
- Strive to promote our zero-tolerance approach to discrimination, sexual harassment and abuse in all working environments;
- Strive to develop relationships with all stakeholders which are based on equality, trust, respect and honesty;
- Place the safety and welfare of vulnerable people above all other considerations;
- Report any concerns they may have about the welfare of a child or other vulnerable person;

- Report any concerns they may have about the behaviour of a Human Appeal representative in relation to safeguarding;
- In a one-to-one situation with a child or young person, where privacy and confidentiality are important, ensure that another adult knows the contact is taking place and why; and where possible ensure that another adult is in sight and that the child or young person knows another adult is around;
- Respect the basic rights of all humans regardless of gender, disability, ethnicity, religion, caste, language, sexual orientation, HIV status and other aspects of identity;
- Act fairly, honestly and tactfully to treat people with dignity and respect.

All HA employees within the scope of this Policy **WILL NOT:**

- Sexually harass, assault or abuse another person;
- Physically harass, assault or abuse another person;
- Emotionally abuse another person, such as engaging in behaviour intended to shame, humiliate, belittle or degrade;
- Participate in behaviour which is abusive, discriminatory, illegal, or unsafe;
- Develop, encourage or fail to take action of relationships with children or other vulnerable people which could in any way be deemed sexual, exploitative or abusive;
- Act in ways that may be violent, inappropriate or sexually provocative;
- Agree with a child to keep a secret which has implications for their safety or the safety of other young people;
- Expose a child, fellow staff or vulnerable adult to inappropriate images, films and websites including pornography and extreme violence;
- Act in ways intended to shame, humiliate, belittle or degrade children, fellow staff and vulnerable adults or otherwise perpetrate any form of emotional abuse;
- Use language, make suggestions or offer advice which is inappropriate, offensive or abusive;
- Have a child or a vulnerable adult with whom you are working to support stay overnight at your home unsupervised unless exceptional circumstances apply and previous permission has been obtained from their line manager, and local government authority;
- Exchange money, employment, goods or services for sexual favours;
- Ask for or invite any personal payment, service or favour from others, especially beneficiaries, in return for our help, support, goods or services of any kind.

8.1 Trustees

Hold ultimate accountability for safeguarding as an integral part of the cultural environment within Human Appeal that embodies safeguarding. They have legal obligations to ensure that the organisation and their activities are in the best interests of staff, volunteers, children, and people at risk and that they take all reasonable actions within their power to prevent all forms of sexual exploitation, abuse and harassment. They will at all times have an appointed safeguarding executive on the board.

8.2 The Chief Executive Officer

Holds responsibility for the existence and implementation of this Policy as leadership builds a safeguarding culture and he/she delegate's authority for its implementation in any country with the Country Director, and to the Director of People & Culture in the UK and the Global Safeguarding Lead.

8.3 Managers

Managers at all levels are responsible for ensuring employees, consultants, volunteers, visitors and partner organisations are aware of the policy and are supported to implement and work in accordance with it, as well as creating a culture that encourages a focus on safeguarding. They must ensure that they are responsive, acting immediately if they become aware of any safeguarding concerns, and supportive towards employees or volunteers who complain about breaches in this policy.

8.4 People and Culture Department

Review the Code of conduct policy in a periodic manner and manage any disciplinary process involving a safeguarding issue.

8.5 Global Safeguarding Lead

Human Appeal has an appointed UK (head office based) designated person who leads on safeguarding concerns across Human Appeal including its overseas operations. The Global Safeguarding Lead is responsible:

- for ensuring that HA safeguarding arrangements are maintained as appropriate and robust, including input to this Policy and its review, and ensuring its periodic review and updating, along with associated procedures;
- for ensuring that country offices have local policy and procedures in place to deal with safeguarding concerns, including direct complaints;
- for offering technical support to the in country safeguarding focal person as he/she reports a safeguarding concern externally such as to the police. The in country safeguarding focal person should acquire police case number for internal documentation.

- in the case of a safeguarding issue involving a child, for being the point of contact for the parents or guardian of the child;
- in the case of a vulnerable adult, for being the point of contact of a carer if one is appointed for that vulnerable person;
- for managing the process initiated to deal with any safeguarding issue, to a proper conclusion, including the associated record-keeping.

8.6 In-country Safeguarding Focal Person

Each Country Director with support from Global Safeguarding Lead will designate a staff member from within the Country team to take the lead role for safeguarding within the operations of that country.

9. Policy Provisions

9.1 Staff Recruitment

Human Appeal ensures that robust processes are in place to manage their recruitment and selection. Appropriate safeguarding mechanisms include reference checks and DBS screening checks to ensure, as far as is possible, that personnel who may realistically pose a safeguarding risk are not engaged.

9.2 Staff Training

Human Appeal designs and implements training interventions to build staff knowledge of the safeguarding subject, to ensure that they understand the position of Human Appeal as regards to safeguarding, to hold sufficient level of knowledge and understanding of the subject, and can exercise their personal obligations in respect of safeguarding whilst engaged in Human Appeal activities. Staff will receive periodic refresher training to ensure that their knowledge remains current and relevant.

9.3 Risk Assessment

A Safeguarding Risk Assessment covers from 'design to delivery and exit' for all programmes, projects and humanitarian responses. This includes working with and through partners. A safeguarding risk assessment include:

- Step 1: Identifying the level of contact with beneficiaries (Children and vulnerable adults);
- Step 2: Identifying the risks to children and vulnerable adults inherent in the thematic areas of work/approaches, operational procedures and systems and delivery of activities;
- Step 3: Assessing the strength of safeguarding systems already in place, including appropriate training and application and embedding of relevant policies and procedures;
- Step 4: Assessing the potential risk posed by the individual program/project or organisation, identifying mitigating factors as the result of Steps 3 and 4;

- Step 5: Establishment of the overall contextual safeguarding risk and a decision to proceed or not;
- Step 6: Resource Plan and agreements to mitigate and manage risks;
- Step 7: Monitoring of any action plan and/or agreement in place within the programme, project or partner.

9.4 External Stakeholders including Donors

Human Appeal will ensure that its approach to safeguarding is clearly and visibly stated so as to be accessible to any external stakeholder, including its donors, so they can be clear about where, as an organisation, HA stands on the matter of safeguarding, and how it will meet its obligations. All external stakeholders will undergo a safeguarding briefing, sign the policy prior to interacting with HA projects.

9.5 Partner Selection and Supervision

Pre-qualifying and other selection criteria will be applied to the choice of partner organisations such as local/country partners and suppliers, to ensure that such organisations apply sufficient emphasis on their own approach to safeguarding, and Human Appeal can be reasonably assured of their approach prior to their appointment and engagement.

Human Appeal where appropriate depending on the partner needs, will offer capacity building to the selected organization, will also apply appropriate arrangements for the ongoing monitoring and review of partner performance to ensure HA of their ongoing safeguarding compliance commitment and obligations.

9.6 Designated Global Safeguarding Lead

Human Appeal has Global Safeguarding Lead, ensuring that all staff members are made aware of the named person and the process for reporting any concern to the Global Safeguarding Lead. The Global Safeguarding Lead will:

- be responsible for ensuring that the Safeguarding Policy is regularly reviewed and maintained as fit-for-purpose and that safeguarding is promoted openly across the organisation;
- ensure that each country in which HA operates has a designated in-country Safeguarding champions; and that each country adopts this Policy to recognise local requirements, and ensures it has the processes in place to manage safeguarding in accordance with this Policy;
- oversee the safeguarding training across the organisation to support the implementation of this Policy and ensure that safeguarding is properly embedded in the culture and values of the organisation;

- ensure that robust reporting mechanisms are in place for any person to readily identify how to make a Safeguarding Complaint and submit such a Complaint;
- be the recipient of any Safeguarding Complaint and ensure that there is robust recording and documentation;
- conduct investigation of safeguarding complaints, to establish the facts, and deal with the matter in a manner that satisfies the objectives of this Policy;
- support relevant investigation managers on multifaceted concerns in collaboration with relevant departments;
- lead the learning process and implementation of such derived learning, from any safeguarding incident;
- act as the focal point for advice and assistance to others within Human Appeal on matters of safeguarding;
- Make referrals to, and liaise with, external agencies and authorities to enable safeguarding matters to be properly dealt with.

10. Organisation Behaviour

10.1 All beneficiaries, including children, young people and vulnerable adults, are to be treated with respect by staff, recognising their right to personal privacy.

10.2 Staff should not spend time alone with children or vulnerable adults, instead activities should be planned so that more than one person is present or, at least, with other people within sight and hearing.

10.3 Inappropriate physical contact with children, young people and vulnerable adults should be avoided, especially that which is forbidden or advised against in Islamic teaching.

10.4 Project activities should be planned and organised so that safeguarding risks are minimised.

10.5 Staff must not make racist, sexist or other discriminative remarks, especially in front of vulnerable people.

10.6 Staff must take care not to show favouritism towards particular children or young people.

10.7 Sexual relationships between project workers are discouraged and such relationships with beneficiaries are strongly PROHIBITED as such relationships are based on inherently unequal power dynamics, and would undermine the integrity of Human Appeal's work to help vulnerable people.

10.8 Staff must take care not to put themselves in a position either by their words or actions where their intentions could be misinterpreted.

10.9 Any requirement to apply a sanction such as through the disciplinary procedure must be carried out in such a way as to avoid humiliation, through applying a considered and sensitive approach to such matters.

10.10 Whilst safeguarding matters will always be dealt with in a confidentiality manner, information will be shared as is deemed necessary, taking account of the need to balance the interests of all concerned as well as protect the organisation.

10.11 Staff should be guided by the values of Human Appeal.

11. Safeguarding Reporting

It is **mandatory for all staff member to report concerns**, suspicions, allegations/rumours or incidents which indicate abuse or potential abuse or exploitation of vulnerable people, or where there is a suggestion that this Policy has been breached.

There is no threshold for reporting a safeguarding concern as described in this policy. Any concern, however minor, must be reported;

All suspected or actual incidents of abuse and SEAH are to be reported as a matter of urgency and always within 24hrs 24/7 within 365 days of a person becoming aware of the incident within HA.

Reporting does not require the staff member to make any decision about whether or not the abuse has actually taken place. Having grounds to reasonably believe that abuse has occurred or that there is a real threat of abuse occurring is enough to raise a Safeguarding Complaint. If in doubt, then the staff member should have a confidential discussion, in person or via telephone, with the Global Safeguarding Lead.

Staff are encouraged to report in **good faith**, and **malicious reporting** is prohibited. If realized, disciplinary action will be taken against the reporter. No staff will be allowed to conduct investigation of at any point.

11.1 Safeguarding Reporting

Staff have a wide range of reporting mechanisms that allow them to report concerns anonymously or unanonymously. A report should include **4W**:

- **What happened:** The reporter should be able to mention facts about the incident.
- **Who is/are involved:** This includes the SOC, Survivor/victim and witness.
- **Where:** This explains the exact location where the incident occurred.

- **When:** This indicates the time and date of the incident. The reporter may also give date range or may describe an event that occurred.

NB: If any of the W is left out, it **may limit** the investigation team in gathering all relevant information for actions to be taken. However, all reported complaints are taken seriously and acted upon according to defined policies and processes.

11.2 When is the reporting done?

All safeguarding complaints/concerns should be strictly reported within 24 hours from the time HA staff becomes aware of the incident. This is to manage complaints in a timely, fair and appropriate manner that prioritises the safety of the complainant and those affected from the initial stage to case closure.

11.3 Reporting channels and levels

To ensure that any safeguarding complaint is timely reported, HA has put in place a number of reporting channels to ensure everyone within the organization has access to reporting. The reporting mechanisms are divided into two:

Global Safeguarding Reporting Mechanisms:

These are channels that allow complainants to report a concern directly to the Global Safeguarding Lead.

- Email – speakout@humanappeal.org.uk
- Send an email directly to the Chief Executive Officer, Associated Director of People and Culture, Head of Quality and Accountability or Global Safeguarding Lead.

There could be a number of reasons as to why a staff from the country office reports a concern directly to the Global Safeguarding Lead. This could include a situation where the subject of complaint is a senior member of staff part of the reporting process, whereupon they should be bypassed in the reporting process immediately.

Country Office Reporting Mechanisms (adapted according to the country office):

These are the channels designed for specific countries. All safeguarding concerns including SEAH received at this level, should be logged into the online case management system or submitted to the Global Safeguarding Lead by in-country safeguarding focal person.

- Country office toll free number
- Mailbox in all HA premises/offices

- Safeguarding focal persons
- Report to any trusted senior member

Alternatively, in absence of the Global Safeguarding Lead, or if the person making the disclosure feels more comfortable with such an approach, any safeguarding complaint or concern may be raised with a senior manager of the organisation. The individual who receives concerns has an obligation to log the incident into the case management system and inform the in country safeguarding lead for further steps. In all cases, confidentiality should be a priority.

11.4 Recognising a Safeguarding Concern

A safeguarding concern or issue itself may come to light through a number of ways.

- A child, young person or vulnerable adult may report an allegation directly.
- A vulnerable person may make a comment which seems to suggest the existence of a safeguarding issue.
- A vulnerable person may display atypical signs of physical abuse.
- A person may behave in such a way that suggests there are abuse issues involved.
- A staff member may behave in such a way that he/she is not suitable for working with vulnerable people.
- An act or acts of abuse may be witnessed.
- A staff member may become aware of, or hear a rumour of abuse.

NB: Any abused where the subject of concern works with HA or any abused caused by HA program, is a safeguarding concern.

12. Sexual Exploitation, Abuse and Harassment (SEAH)

Human Appeal adheres to the core principles of the United Nations' Task Force on Preventing Sexual Exploitation and Abuse in Humanitarian Crises 2002 and UN secretary General Bulletin: Special measure for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13) in their application to project implementation in relation to children, families and communities, and must apply irrespective of whether or not there is an emergency situation.

- Sexual exploitation and abuse, when proven, is an act of Gross Misconduct which will result in termination of employment.
- Sexual activity with a child or a vulnerable adult is prohibited by Human Appeal, regardless of the criminality of the offence taking account of the age of majority or consent as defined by local laws. A mistaken belief regarding child's age will not be accepted as a defence.

- Any exchange of money or benefit in return for provision of sex or sexual favours or any other form of humiliating, degrading or exploitative behaviour are strictly prohibited, and will be dealt with under the Human Appeal Disciplinary Policy.
- Should signs of sexual exploitation be identified, an immediate safety plan (including medical attention as necessary) will be developed for all concerned. This is the responsibility of the country director, the Global Safeguarding Lead and the security manager.
- Where a HA staff develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, he or she must report such concerns via established agency reporting mechanisms.

HA staff are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of their code of conduct

HA also abides by the Worker Protection (Amendment of Equality Act 2010) Act 2023 on preventing sexual harassment at work place. HA is committed to ensuring safeguarding measures are embedded, accessible, and communicated clearly to staff, partners, vulnerable adults and their communities, in languages and formats they understand.

13. Child Protection – National and Local Guidance on Safeguarding

13.1 Human Appeal has a statutory responsibility that governs its contact with children within its work in order to safeguard and promote the welfare of children (Section 11 of the Children Act).

13.2 There is a substantial amount of information that provides sound guidance as to the application of safeguarding to children, notably:

- The Children Act 1989;
- The Children Act 2004;
- Every Child Matters;
- Working Together to Safeguard Children: A Guide to Inter-Agency Working to Safeguard and Promote the Welfare of Children (HM Government, 2010);
- Human Rights Act (1998);
- Criminal Justice & Courts Services Act (2000); and,
- The Protection of Children Act (1999)

14. Social Media

It must be recognised that the use of social media has the potential to actually create exploitative situations regardless of good intent, particularly through use of photographs, videos, or articles where particular individuals are personally identified, and in particular where that individual is a child, young

person or vulnerable adult, and where individual permission for any depiction to be used in such requires an even more diligent approval process.

Whilst it is natural to use depictions of human suffering within the publicity materials related to the work of Human Appeal, care must be taken that such depictions themselves are not exploitative of a vulnerable person, and that permissions are obtained based on having given full information to those about the intended use of the depictions involving them, including the parents or guardian of any child.

When the use of social media involves a child, young person or vulnerable adult, then reference must be made to the HA Social Media Policy for full guidance and consent form need to be signed. Beneficiaries' information, pictures uploaded to the media, must consider the Do No Harm principle. A quick risk assessment is to be conducted by the in country safeguarding focal person with consultation with the Global Safeguarding Lead before publishing the information.

15. External Reporting

Where there is any concern that a Safeguarding issue relates to a criminal act, then it is necessary for external reporting to an appropriate designated authority, normally the Police. Such reports are submitted within 24h hours. In such incidents, HA management will make final decisions based on the police report findings. External reporting would also involve when incidents happened in HA premises perpetrated by individuals from other agencies.

External reporting of a safeguarding concern shall normally fall to the Country Safeguarding Focal Person with consultation with the Country Director, P & C Department and the Global Safeguarding Lead. However, where the issue is of sufficient concern and/or the urgency of the matter dictates, then it may be appropriate for the person making the report to contact the relevant external body directly to allow them to take action at the earliest opportunity.

HA implements a **survivor centred approach** which emphasises respect and priority of the rights, needs, wishes, and well-being of survivors and victims. In a situation where a victim chooses not to report concerns to local authorities, HA respects their autonomy while ensuring their safety. Should a criminal act have been committed and if there is an immediate threat to the victim or others, external reporting becomes essential.

16. Reporting to the Authority Bodies

Should reported safeguarding incidents meet the criteria as serious incidents as per HA Serious Incident Reporting Policy, they will be reported to relevant authority bodies including Charity Commission.

This policy will be implemented in accordance with:

- All relevant UK laws protecting children, staff and vulnerable adults from abuse including SEAH, violence and harm and those outlining measures for reporting known or alleged cases of abuse;
- Applicable laws within the countries where HA operates; and
- The United Nations Convention on the Rights of the Child (UNCRC),
- The UN Secretary General's Bulletin: Special measures for protection from sexual Exploitation and abuse (ST/SGB/2003/13) and other applicable international treaties, laws, and conventions.

17. Policy Review

This policy will be reviewed bi-annually to ensure continuing appropriateness.

18. List of Related Policies

1. Staff Code of Conduct
2. Protection of Sexual Exploitation, Abuse and Harassment Policy
3. Whistle blow Policy
4. Social Media Policy
5. UN secretary General Bulletin: Special measure for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13)
6. Child Protection Policy
7. Beneficiary Complaint and Response Policy
8. Serious Incident Reporting Policy