

Safeguarding Policy	
Policy Level:	Level 1: Global Policy
Policy Owner:	Director Safeguarding and Security
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Policy Reviewer:	Leadership Team
Policy Approver:	Chief Executive Officer

Approved & Disseminated By:
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Laurie Adams CEO, Women for Women International

This policy supersedes Safeguarding Global Policy #L1-2019-01, issued on April 15, 2019.

SECTION 1 - INTRODUCTION

OBJECTIVE

This policy was created to confirm Women for Women International's commitment to protecting all vulnerable persons and, in particular, women, adolescent girls and children from harm, harassment, bullying, abuse and exploitation.

SCOPE

This policy applies to:

Women for Women International, subsidiaries and sister affiliate organizations (collectively "**Women for Women International**" or "**WfWI**");

All Employees, full time or part time, international or national, and to those engaged on contracts (referred to as “**employees**”);

Interns, volunteers, consultants, contractors, researchers, etc. (referred to as “**partners**”);

Employees and Partners of partner agencies and any other individuals (referred to as “**partners**”);

Groups, organizations, or individuals who have a formal contractual relationship to WfWI (referred to as “**partners**”).

Donors, board members, journalists, celebrities, politicians and other people who visit WfWI programs or offices (referred to as “**partners**”).

Beneficiaries of WfWI programs (referred to as “**participants**”). Beneficiaries/participants may include **adults** (18 years or older) or **children** (anyone under 18 years) or adolescent girls (for WfWI programming refers to girls age 15-17 years) or **teen mothers** (may include any person 13-19 years inclusive of children 13-17 or adults 18-19 years).

SECTION 2 - POLICY PRINCIPLES

1. WfWI takes serious responsibility for safeguarding practices and Prevention from Sexual Exploitation, Abuse or Harassment (PSEAH) to protect all vulnerable persons from harm, abuse, neglect, trafficking, bullying, harassment and exploitation in any form. All people, including children, will be treated with respect regardless of gender, nationality, or ethnic origin, religious or political beliefs, age, physical or mental health, sexual preference and gender identity, family, socio-economic and cultural background, or any history of conflict with the law. **WfWI has zero tolerance for harassment, abuse and exploitation or inaction** in reporting knowledge of a safeguarding/PSEAH concern or incident. This means that we will terminate the employment of and possibly report to legal authority any staff member we believe, after careful investigation, has committed these offenses or failed to report knowledge of a case.
2. WfWI conducts its activities according to the highest ethical and professional standards and in a way that protects the rights and safety of all persons. WfWI's core values and commitment to the United Nations Convention on the Rights of the Child (UNCRC) and signing of the InterAction CEO Pledge on Preventing Sexual Abuse, Exploitation and Harassment by and of NGO Staff reflects the standards of conduct that all employees must meet while working for or on behalf of WfWI. Also, UN-OCHA's IASC's Six Core Principles for PSEA.
3. WfWI expects all employees and partners to uphold these same standards even when they are not directly working with WfWI and may terminate a relationship with any organization or person that does not uphold the highest personal and professional ethical standards and adhere to the provisions of this policy.
4. The decisions and actions in response to Safeguarding/PSEAH concerns and breaches of this policy will be guided by the principle of 'the best interests of the person impacted.' WfWI is committed to a survivor-centered approach to any instance of sexual

exploitation and abuse and will prioritize the needs, rights and wishes of the survivor.

The survivor has a right to:

- a. be treated with dignity and respect and not be exposed to victim-blaming attitudes.
 - b. choose the course of action in dealing with the violence instead of feeling powerless.
 - c. privacy and confidentiality instead of exposure.
 - d. non-discrimination instead of discrimination based on gender, age, race/ethnicity, ability, sexual orientation, HIV status or any other characteristic.
 - e. receive comprehensive information to help them make their own decision instead of being told what to do.
5. All WfWI employees are expected to conduct themselves in a manner consistent with this commitment and obligation to protect all persons from harm. Any violation of this policy will be treated as a serious issue and may result in disciplinary action, up to and including termination and any other available legal remedy.
6. It is WfWI's policy to ensure compliance with host country and local welfare and protection legislation, or international standards, whichever affords greater protection, and with U.S. law, where applicable. The requirements of this policy are in addition to any other applicable legal requirements.
7. In relation adolescent girls WfWI is committed to ensuring the protection and safety of all adolescent girls who engage with our organization. In line with this commitment, WfWI has written this Safeguarding/PSEAH Commitment to:
- a) Protect all adolescent girls who engage with our work in any capacity from all forms of harm;
 - b) Promote the well-being of adolescent girls who engage with our work in any capacity, enabling them to achieve the best possible outcomes;
 - c) Ensure that WfWI staff and representatives are aware of their obligations under this commitment;
 - d) Ensure the right procedures and protocols are in place to quickly and effectively respond to concerns that may place adolescent girls at risk as a result of their involvement with WfWI;
 - e) Ensure that the adolescent girls we work with are aware of our commitment to promote their well-being, prevent and respond to any harm against them and know how to report concerns and/or access support through reporting mechanisms.

SECTION 3 - POLICY

1. All WfWI employees and partners must act in accordance with this policy in both their professional and their personal lives.
2. All WfWI employees and partners must sign the Declaration of Acceptance prior to or at the time of issuing any employment or contractual agreement, or before travel to a WfWI location.
3. All WfWI employees and partners must:

- a. report any vulnerable person abuse and/or protection concerns immediately in accordance with procedures laid out in the WfWI Reporting and Whistleblower Policy;
 - b. undertake induction and training on this policy which is relevant and appropriate to their position so that they can undertake their responsibilities effectively and with confidence;
 - c. cooperate fully and confidentially in any investigation of concerns or allegations of vulnerable persons' abuse;
 - d. respond to a vulnerable person who may have been abused/exploited in accordance with his/her best interest and safety;
 - e. identify, minimize, and attempt to avoid potential situations of risk for vulnerable people;
 - f. identify and avoid potential situations which may lead to staff behavior being misinterpreted;
 - g. ensure, when making images of vulnerable people (e.g., photographs, videos), that they are respectful, that the people are adequately clothed and that sexually suggestive poses are avoided;
 - h. ensure that any image or recorded case history of a vulnerable person does not place him/her at risk or render him/her vulnerable to any form of abuse;
 - i. ensure that this policy is complied with, and if any vulnerable person is to participate in any activity other than as a program participant, e.g., a campaigning event, awards ceremony, panel or any other event or in internet social networking;
 - j. disclose any convictions or child-related investigations to which they are subject.
4. All WfWI employees and partners must never:
- a. hit or otherwise physically assault or physically abuse another person;
 - b. have sexual intercourse, or engage in any sexual activity, with a program participant or anyone under 18 years of age, regardless of the age of consent locally. Mistaken belief in the age of the child is not a defense;
 - c. develop relationships with vulnerable people which could in any way be deemed exploitative or abusive;
 - d. act in ways that may be abusive or may place a vulnerable person at risk of abuse;
 - e. use language, make suggestions or offer advice to vulnerable people, which is inappropriate, offensive or abusive;
 - f. behave in a manner which is physically inappropriate or sexually provocative;
 - g. condone, or participate in, behavior of vulnerable people, which is illegal, unsafe or abusive;
 - h. act in ways intended to shame, humiliate, belittle or degrade vulnerable people, or otherwise perpetrate any form of emotional abuse;
 - i. discriminate against, show unfair differential treatment or favor to particular vulnerable people to the exclusion of others;
 - j. act as negotiator or assist in the process of financial settlement between the family of a victim of sexual abuse or exploitation and the perpetrator;
 - k. participate in a professional situation where a WfWI employee or partner is alone with a child. Best practices require that multiple WfWI personnel are in attendance when children are present. (Also see WfWI's Global Policy on Working with Adolescent Girls for more details.)

This is not an exhaustive or exclusive list. WfWI persons should at all times avoid actions that may allow behavior to be misrepresented or constitute poor practice or potentially abusive behavior.

5. WfWI employees are also prohibited from engaging in any of the activities listed and defined below, either on or off the job:
 - a. Trafficking in Persons – Recruitment, transportation, transfer, harboring or receipt of persons, by means of the threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of power or a position of vulnerability, or giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation, regardless of whether the victim provides consent. Exploitation includes, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labor or services, slavery or practices similar to slavery, servitude or the removal of organs.
 - b. Procurement of a commercial sex act - Visiting, paying or engaging prostitutes or arranging for others to do so.
 - c. Use of forced labor in the performance of a donor-funded award or otherwise.
 - d. Acts that directly support or advance trafficking in persons, including the following:
 - i. Destroying, concealing, confiscating or otherwise denying an employee access to their identity or immigration documents such as passports or drivers' licenses;
 - ii. Failing to provide or pay for return transportation costs at the end of employment to a country outside the U.S. from which an employee was recruited unless there is an applicable exemption, the employee is legally permitted to remain in the country of employment and voluntarily chooses to do so, or the employee is a victim of human trafficking seeking victim services or legal redress, or a witness in a human trafficking enforcement action, in the country of employment.
 - iii. Soliciting for or offering employment by means of misleading, false or fraudulent pretenses, representations or promises.
 - iv. Charging employees recruitment fees or using recruiters that do not comply with labor laws in the country of recruitment;
 - v. Providing or arranging housing that fails to meet the host country housing and safety standards.
6. All WfWI staff and representatives must be aware that any allegation of the abuse or exploitation of women, children or other vulnerable parties made against them will be investigated, under these Safeguarding/PSEAH policies:
 - a. by consideration of referral to statutory authorities for criminal investigation and prosecution under the law of the country in which they work; and/or
 - b. by WfWI in accordance with the WfWI Reporting and Whistleblower Policy and Code of Conduct.
7. By following this policy, WfWI persons will be both playing their part in Safeguarding/PSEAH vulnerable people and developing best practices. As with the WfWI Code of Conduct, if a staff member breaks this policy or fails to meet the standard of behavior that it requires, disciplinary action may be taken. This may include dismissal

and/or referral to national authorities for criminal investigation and prosecution, should the law be broken in which the offense is committed.

8. Recruitment

WfWI will ensure recruitment processes minimize potential risk of engaging individuals who are unsuitable to work with women or adolescent girls.

For staff:

- 1) All job descriptions are categorized as requiring basic or enhanced level checks. This will depend on:
 - a. The level of direct contact with women or adolescent girls;
 - b. The level of indirect contact through accessing personal information; and
 - c. The level of responsibility for work that directly or indirectly involves women or adolescent girls.
- 2) Appropriate reference checks confirming the applicant's suitability to work with children and/or young people are completed and documented on all personnel files. This includes verification that applicants are not listed in national registries of child offenders.
- 3) Country-specific checks are completed and renewed every 3 years. For example, the Disclosure and Barring Service (DBS) in the UK.
- 4) Interview processes include a question on safeguarding/PSEAH.

For consultants:

- 1) Independent reference checks will be verified prior to work commencing. References cannot be family members and must have known the candidate for at least 3 years.
- 2) Country-specific checks are completed prior to any direct or indirect engagement with adolescent girls commencing. For example, the Disclosure and Barring Service (DBS) in the UK. Where such checks are not formally available, WfWI will solicit additional references to confirm the consultant's suitability to work with children and/or young people.
- 3) Interview processes include a question on child safeguarding if direct contact or handling of adolescent girls' data is part of the consultancy assignment.

9. Partnerships

WfWI will ensure that all agreements with implementing partners, other individuals, groups or organizations who have a formal contractual relationship with WfWI that involves contact with women, adolescent girls or any other children includes adherence to the Safeguarding/PSEAH Commitment. Partners must adopt this Commitment or have their own policy of a similar standard in place that will be verified by WfWI. Partnership agreements must clearly outline procedures for reporting and investigating concerns involving safeguarding incidents.

Additional measures will be taken to assess Safeguarding/PSEAH implications for partnerships. Such measures include, but are not limited to:

- a) Ethical reviews as part of due diligence processes of existing and potential partnerships to identify investments or operations that expose women, children and/or young people to any form of harm.
- b) Partnership agreements including reference to how data privacy, security, ownership and consent will be adhered to, including the sharing and destruction of data.
- c) Safeguarding briefings provided to partners outlining their obligations under WfWI's Safeguarding Commitment.
- d) Partnership agreements including a clear process for handling breaches of the Safeguarding Commitment.

SECTION 4 - DEFINITIONS

Child: in line with the UN Convention on the Rights of the Child, and for purposes of this policy, WfWI defines a child as anyone under 18 years of age. WfWI recognizes that some national legislation recognizes the possibility that children will obtain the age of majority earlier under certain circumstances, but this WfWI definition of a child applies to anyone under the age of 18 regardless of national legislation.

Adolescent Girls: For WfWI programs this is defined as girls aged 15-17 years. By definition, adolescent girls in this policy are a subset of children.

Age of Consent: Regardless of local law or custom the age of consent for WfWI is 18 years of age. We recognize that girls younger than 18 years of age may be married and have children of their own. This policy ensures that all necessary safeguarding and PSEAH measures for children apply to them also.

Allegation of misconduct: a claim, complaint, or assertion that someone has done something illegal or wrong.

Misconduct: refers to assault, harassment, discrimination, bullying and exploitation of a sexual nature; fraud and any other form of financial misconduct.

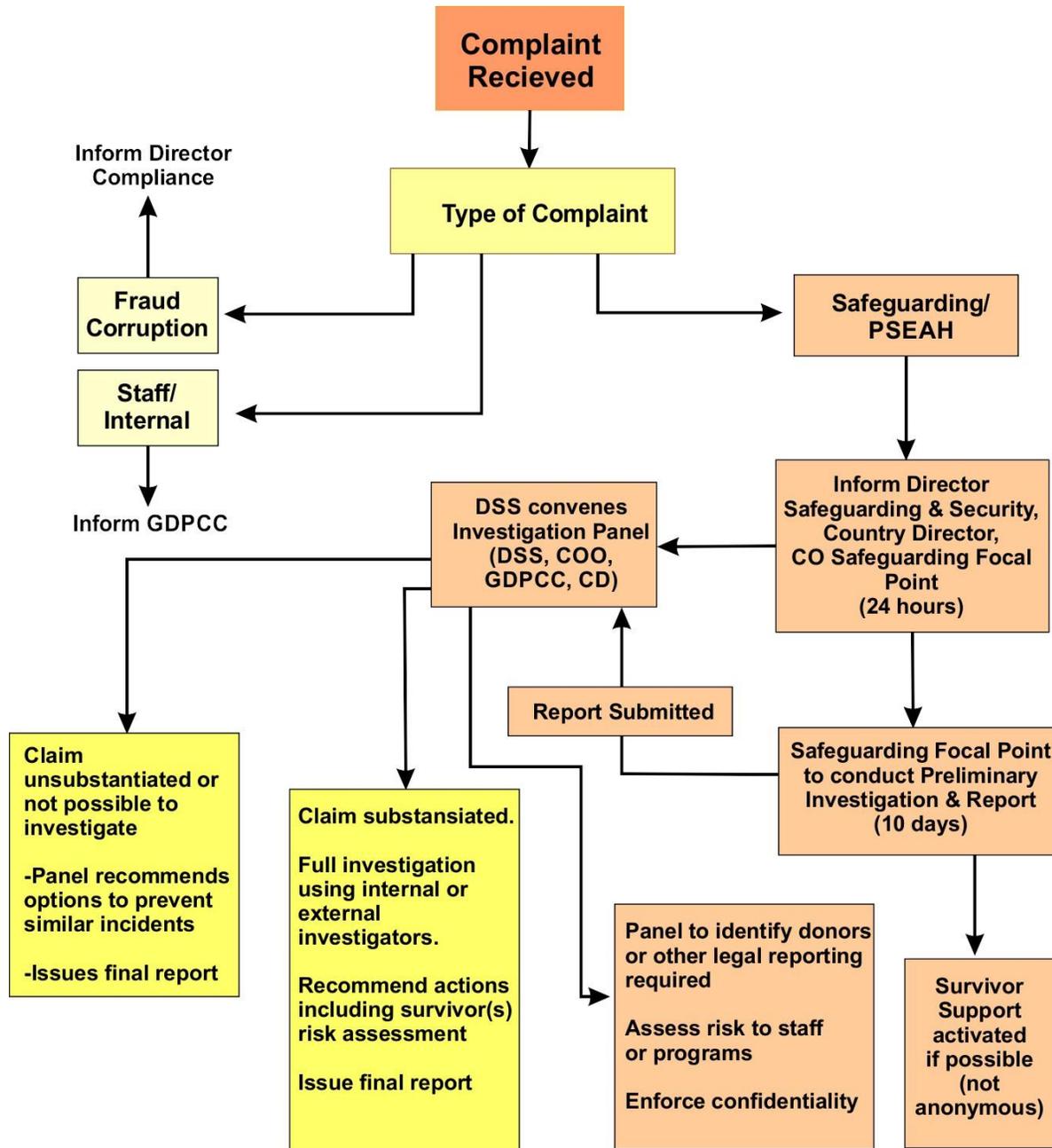
Survivor-Centric Approach: Places needs, requests, and consideration at the center of any response to a safeguarding claim. Especially important where investigating or responding to a claim may put the survivor at additional risk.

Victim-Blaming: In investigating any claim there is a tendency to question why the survivor did or did not take actions that suggest some element of blame. WfWI does not accept victim blaming in pursuing any safeguarding/PSEAH claims.

ANNEXES

ANNEX A

Safeguarding Investigation Process



ANNEX B**Safeguarding/PSEAH Guidelines**

Current as of: 25 July 2022

Introduction and Terms**1. Objective**

The purpose of the Safeguarding Guidelines is to provide direction to WfWI country offices in building capacity and compliance with the WfWI Safeguarding policy. Where the policy sets out WfWI's strategy in ensuring a safe and equitable environment for all staff, participants in programs and communities; this document provides the specifics needed to ensure our organization can effectively implement these policy directives.

2. Scope

This set of guidelines applies to all Global Support Center (GSC) country offices, programming country offices and any place where WfWI staff are present.

3. Legal Compliance

Each country where WfWI has a presence will have different legal interpretations of safeguarding/PSEAH law and often diverse compliance requirements. This guidance document is intended to support our country offices in ensuring they are compliant with both local legislation as well as WfWI policy. Where there is a conflict between this guidance and local legal requirement, the local jurisdiction takes precedent, *(the only exception being age of consent – see below)*.

4. Definitions

The following definitions are key to understanding these guidelines:

Safeguarding	The responsibility to ensure all people are protected from harassment, exploitation, abuse, neglect or any other form of harm regardless of age, gender, gender identity, sexual orientation, religion or ethnic origin.
PSEAH	Protection from Sexual Exploitation, Abuse or Harassment
CoC	Code of Conduct
GBV	Gender Based Violence
FGM	Female Genital Mutilation

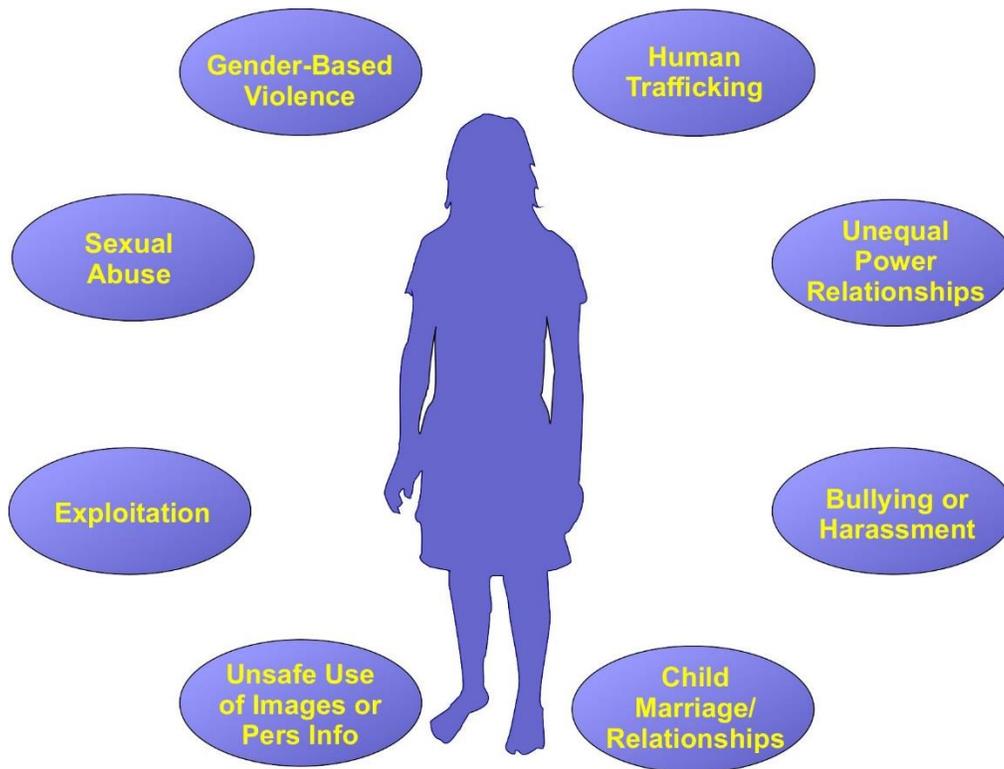
Age of Consent Regardless of local law or custom, the age of consent for WfWI is 18 years of age.

What is Safeguarding?

5. Understanding Safeguarding

Safeguarding is primarily a function of the ‘Do No Harm’ principle of all humanitarian, development and advocacy work. While we would all like to believe we are only motivated by a desire to help our fellow human beings, the reality is that there is a long record of abuse, exploitation and harassment that has occurred between NGO staff and members of the communities they serve. WfWI has a moral and legal responsibility to ensure that this does not occur within our organization...ever!

Safeguarding Threats



Gender based Violence (GBV) -Physical and/or mental violence that is targeted based on gender including Female Genital Mutilation (FGM)

Human Trafficking -Men, women or children either kidnapped, sold or otherwise forced into a situation of slavery, sexual

	exploitation or other situation where they have no human rights.
Unequal Power Relationships	-Any relationship where one party has significantly more power than the other. With NGO's this is often between those who control access to aid and those desperately in need.
Bullying or Harassment	-Bullying is any aggressive behaviour that seeks to belittle, frighten or intimidate another person. Harassment is anything that makes another person feel uncomfortable.
Child Marriage/Relationships	-WfWI is firm on the age of consent being 18 years of age regardless of local law or custom. No adult over 18 can have any sexual or inappropriate relationship with anyone under the age of 18 years.
Unsafe Use of Images/Info	-The use of photos or stories of vulnerable people with enough information to identify or locate the subject places that individual or community at risk.
Exploitation	-Generally, abusers take advantage of those in need for their own advantage including for labour, sexual abuse or other activity through threats or manipulation.
Sexual Abuse	-Violence and unwanted sexual activity, often as a form of control or punishment and typically part of a power imbalance situation.

5.1 ***This is not a complete list*** of Safeguarding/PSEAH threats. There are certainly other situations where the principles of safeguarding will come into play. One common theme of almost all safeguarding threats is that they are based on unequal power relationships. Someone has a form of power and uses their position or access to abuse their position and take advantage of others for various motivations.

For more information on Safeguarding and PSEAH the Resource & Support Hub is an excellent source

Available in:

Summary brief

International Standards on
Sexual Exploitation, Abuse and Sexual Harassment



-English
-Arabic
-Yoruba
-Swahili
-French
-Igbo
-Hausa

6. Safeguarding versus Workplace or Ethics Complaints?

It is important for all staff to understand the different types of complaints, who they are reported to and how each type differs. To effectively respond to the different types of concerns or incidents requires different skillsets held only in the appropriate department.



Staff Workplace Complaints

- Typically, these complaints are related to work conditions, overwork, poor management, failure to follow policies or disagreements with co-workers.
- These should be reported to your HR representative first but can be escalated if needed.
- Workplace complaints can also include harassment or inappropriate behaviour between staff. In this case, Director Safeguarding and Security can be contacted and will be involved in any investigation.

Fraud or Ethics Complaints

- These are primarily finance-related such as theft of funds or WfWI materials, misappropriation of funds, unethical procurement practices, conflict of interest or other misdirection of resources.
- These should be reported to the Director Global Finance & Compliance.

Safeguarding and PSEAH Complaints

- These complaints are the focus of these guidelines. Complaints or accusations by program participants, members of communities or any external source against a WfWI staff member or person representing the organization. These should be reported to the Director Safeguarding and Security.
- Complaints made by a staff member of a safeguarding/PSEAH nature, can also be reported to the Director Safeguarding and Security.

6.1 Confidentiality

As explained further below, confidentiality is critical in all types of complaints to ensure that the complainant or survivor's identity is protected, a successful investigation can be conducted and no targeting or negative impact on the complainant is allowed as a result of making a complaint or report.

7. WfWI Office Responsibilities

Each WfWI office is required to enforce our Safeguarding/PSEAH standards. This includes:

- Senior management awareness of all Safeguarding/PSEAH policies and compliance standards and the rigorous enforcement of those standards.
- Appointing of a Safeguarding Focal Point who will have a full understanding of the policy and the time included in their role descriptions (see below) to build capacity around Safeguarding/PSEAH principles.
- Ensure additional attention is focused on adolescents involved in WfWI programs or with children in the community as these two groups are always at increased risk of abuse or manipulation.
- Country HR staff to make all staff aware that relationships, including marriage to anyone under the age of 18 is prohibited by WfWI Safeguarding policy. HR staff to ensure that confirmation of this fact is integral to all recruitment activity.
- Country management team to ensure all partner organizations are either compliance with WfWI Safeguarding standards, including working with children and adolescents; or have their own policy that is also demonstrated in practice and does not contradict WfWI standards in any meaningful way.
- Ensure that the office and any projects managed by that office have a robust reporting system that is accessible by all staff, program participants and members of the communities where we work.
- Ensuring that all staff receive, at minimum, annual training on Safeguarding/PSEAH and that they demonstrate awareness of safeguarding principles.
- Ensure all new staff receive safeguarding training as part of their onboarding process.
- Identify internal and external investigators in their context that can support investigations into Safeguarding/PSEAH accusations or reports.

- Ensure all Safeguarding/PSEAH accusation, complaints or reports are copied to the Director Safeguarding and Security within 24 hours, or the Chief Operating Officer in their absence.
- Brief all visitors, consultants and anyone else visiting programs or communities on behalf of WfWI on our Safeguarding/PSEAH policy.

8. Safeguarding Focal Points

Each country office globally requires a minimum of one designated Safeguarding focal point. The basic requirements for a focal point are:

- Someone with an interest and hopefully passion for safeguarding and PSEAH.
- A person of trust, who demonstrates to all staff that they can be trusted to receive complaints, be survivor centric, maintain confidentiality, investigate fairly and understands the needs of psychological first aid.
- Clear understanding of WfWI's safeguarding policy.
- Knowledge of national safeguarding legislation as well as UN-OCHA's IASC's Six Core Principles for PSEA.
- A role that will allow up to 10% of time spent on Safeguarding/PSEAH including monitoring of country reporting channels, training staff and program participants, onboarding new staff in safeguarding policy, conducting initial investigations around complaints, participating in WfWI safeguarding calls and generally capacity building within the country office.
- Safeguarding focal points also need to be available for an annual WfWI safeguarding workshop as well as attendance in country or possibly regional level capacity building conferences.

9. Safeguarding Budget

Each country office should have a designated line item in their budget to support Safeguarding/PSEAH activities and focal points costs. This budget should support all the above activities including focal points' time if needed, a small travel budget for capacity building and engaging external investigators as needed.

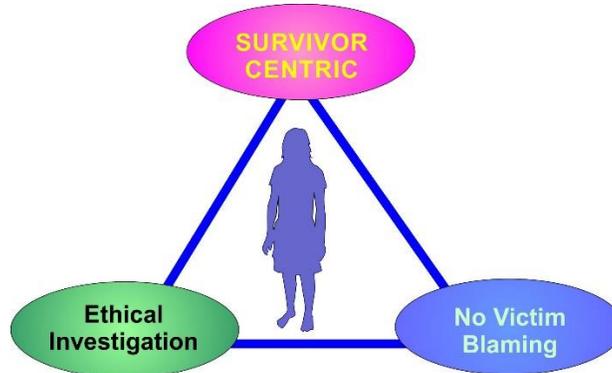
Items to budget for:

- 10% (or percentage of time allocated to safeguarding function) of safeguarding focal point role costs
- Training resources for staff training
- Focal point travel to annual WfWI Safeguarding workshop
- Printing of Safeguarding posters, handouts and similar

10. Reporting Systems

The guiding principle of our Safeguarding/PSEAH standard is a *'survivor-centric'* approach. When receiving or investigating a safeguarding complaint professionalism and

ethics is of critical importance. The safety, protection, confidentiality and support of the survivor(s) is our ultimate guiding principle.



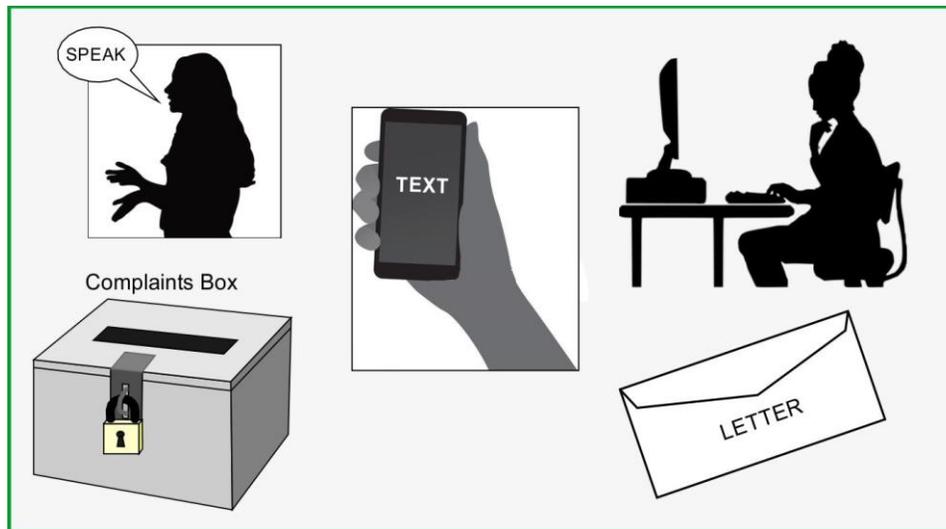
Beyond having a policy, designated focal points and staff compliance, the **critical** component of Safeguarding/PSEAH is reporting. Each country office needs to have a robust system for anyone to report a Safeguarding/PSEAH complaint.

Reporting systems need to be:

- Easily accessible
- Confidential
- Directed to the correct recipient without interference or manipulation.
- Include enough information to conduct a preliminary investigation.

10.1 Accessible by All

Reporting systems must be available and easily accessible for both staff and program participants or members of communities where we work. This may require different architecture with staff submitting complaints electronically and program participants or community members having an offline option that maintains an equal level of



There should be multiple methods for anyone to submit a complaint

Verbal Complaints

- Very often those suffering abuse or observing misconduct will approach someone they trust to report the situation. This will place a great deal of responsibility on the chosen staff member. This is why all-staff capacity building on Safeguarding /PSEAH is critical, so that everyone understands their responsibilities if this happens. **Note: once a staff member is made aware of a safeguarding violation, they MUST report it!**
- An understanding of Psychological First Aid (PSA) is important when dealing with anyone traumatized by a safeguarding/PSEAH incident. This is where our survivor-centric approach is key.

Electronic Complaints

- Each country office needs to have electronic options available for staff, participants and community members to report incidents or violations of Safeguarding/PSEAH. These can include email, texts or similar.
- The GSC is looking at options for a global reporting system, but often getting a system that functions in all languages is the challenge. Where country offices can identify a good national app or system, they should discuss this with the Director Safeguarding and Security.

Written Complaints

- Complaints boxes are currently in use in WfWI training centers and should be continued.

- Any complaints received in this fashion need to be carefully controlled to ensure they are correctly reported to the Safeguarding Focal Point without interference or manipulation. Manipulating or interfering with a complaint by a staff member is cause for termination of employment and possible referral to local authorities.
- Complaints could also be submitted by written letter and again, any staff member receiving such a complaint needs to pass it directly to the Safeguarding Focal Point while maintaining complete confidentiality.

10.2 Confidentiality

In Safeguarding and PSEAH cases, confidentiality is the **KEY** element. This is for many reasons:

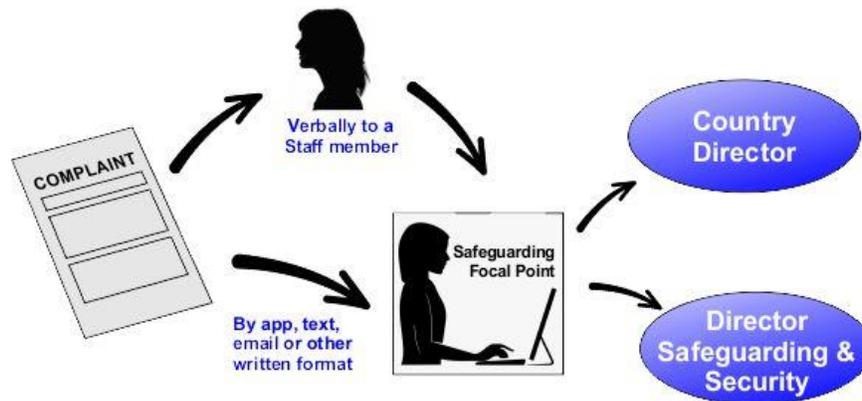
- 1) The survivor centric approach requires trust and we cannot build trust if we cannot maintain confidentiality.
- 2) The safety of a complainant/survivor is often linked closely to the confidentiality of the complaint and any investigation.
- 3) The reputation of the complainant/survivor(s) is also at stake and they must feel in control of how, when and where any information about the case might be discussed outside the investigation.
- 4) A thorough investigation of any report requires full confidentiality to ensure that there is no attempt to confuse, misdirect or interfere with evidence or statements from witnesses.
- 5) The reputation, community acceptance and ability of WfWI to continue to operate will depend on a thorough, confidential and accurate investigation, all of which depends on confidentiality.



Keep it confidential!

10.3 Handling Complaints

As mentioned above, complaints can be submitted by various means. However the complaint comes to us, the process is the same if they are Safeguarding/PSEAH related:



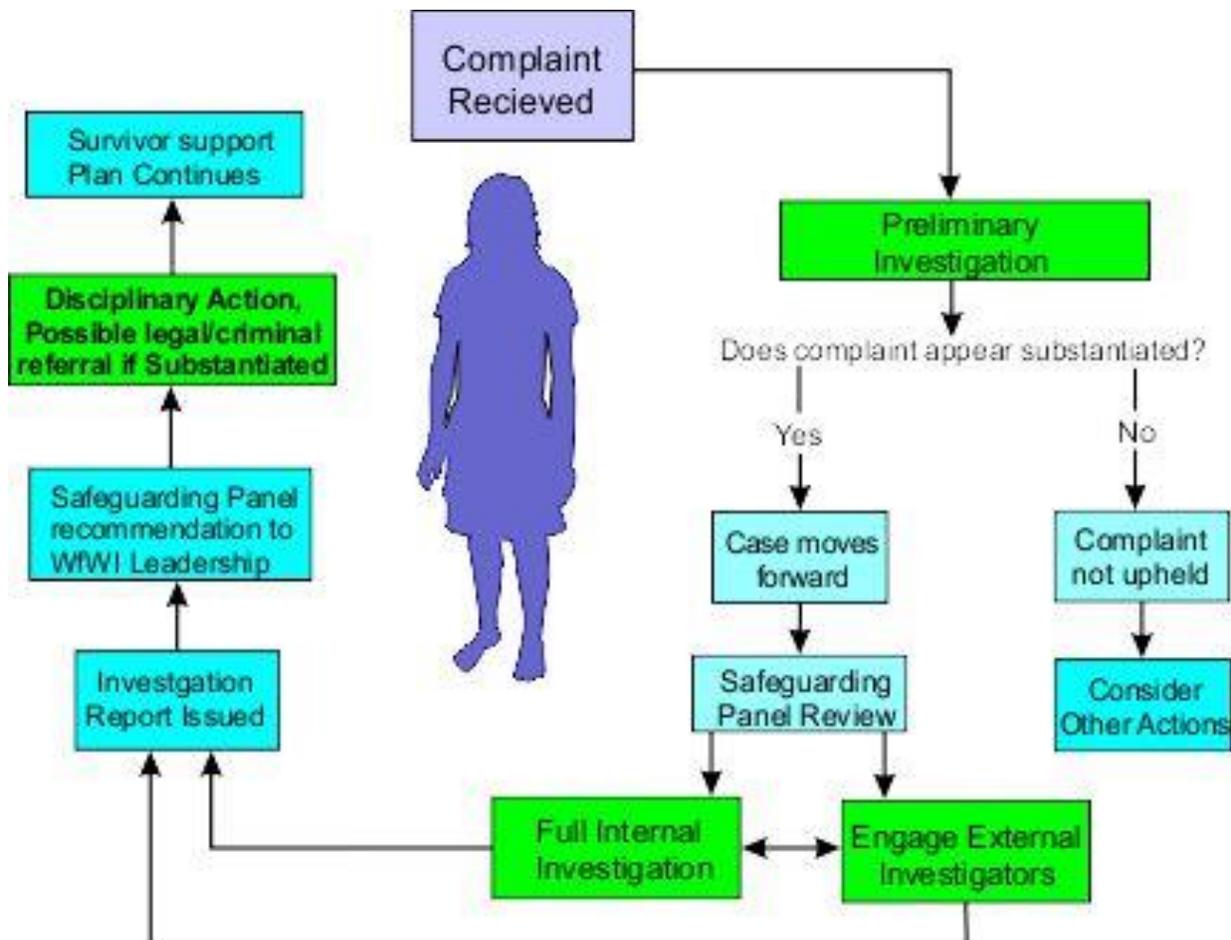
- Complaints reported verbally to a staff member should be reported immediately to the Safeguarding Focal Point.
- Complaints received electronically or in a written form should be addressed to the Safeguarding Focal Point.
- Complaints boxes should be regularly checked by the Safeguarding Focal Point or trusted, designated staff member.
- Complaints against a senior member of staff can be sent directly to the Director Safeguarding and Security.

10.3.1 Once a complaint is received by the Safeguarding Focal Point, it is copied to the applicable Country Director or equivalent as well as the Director Safeguarding and Security.

11. Investigations

If we do receive a complaint, it **must** be investigated. This needs to be done professionally, ethically, confidentially, systematically and thoroughly; always keeping our survivor-centric approach foremost.

All investigations will progress through several stages:



11.1 Preliminary Investigation

The preliminary investigation is generally conducted at the country level in cooperation with the Director Safeguarding and Security. The objective is to gather enough information to determine if the complaint can be substantiated and to inform the decision by the Safeguarding Panel on how to proceed. The Safeguarding Focal Point for the country office will gather the following information:

- A written or transcribed oral statement by the complainant detailing as much information as possible regarding the complaint.
- How the survivor would like to be supported though the process.
- Any other information available that could substantiate the complaint including:
 - emails, texts, photographs
 - witness statements (if not compromising confidentiality)
 - confirmation of circumstances (can we confirm both complainant and respondent were present during the period of the complaint?)
 - Any other information that could substantiate the complaint.

11.2 Once the Preliminary Investigation is done, the results will be submitted in a confidential report to the Director of Safeguarding & Security for review by the Safeguarding Panel.

11.3 The preliminary investigation should take no longer than 10 working days.

11.4 Safeguarding Panel

The WfWI Safeguarding panel generally consist of the following staff:

- Chief Operating Officer
- Global Director People, Capability and Culture
- Director Safeguarding and Security

11.4 The Panel will consult with the applicable Country Director where appropriate as well as legal counsel if advisable.

11.5 If the Preliminary Investigation does not feel the complaint is substantiated, this should also be reported, and why this conclusion was chosen.

11.6 Note, the Director Safeguarding & Security, and the Safeguarding Panel, may overrule the Preliminary Investigation results and conduct an internal investigation when deemed necessary.

11.7 Full Investigation

If the preliminary investigation finds the complaint has sufficient information and recommends that we proceed; or the Director Safeguarding & Security, in consultation with the Safeguarding Panel recommend proceeding, a full investing will be initiated. This will take one of two forms, depending on the location, severity of the complaint and the available resources:

Internal Full Investigation

Depending on the nature of the complaint, once the preliminary investigation is done, the Safeguarding Panel may choose to conduct an internal investigation. This will primarily consist of a more thorough examination of all the available information. It will also include an assessment of the legal and cultural implications since in some contexts any reports of Safeguarding/PSEAH assaults could have negative consequences for the survivor in the community. Selected staff may be compelled to be interviewed in relation to the case.

Note: Internal Investigations may recommend handing over to external investigators if the results demonstrate that the case is serious and has legal implications or presents a high level of risk to WfWI staff, program participants, community members or our reputation.

External Investigation

In some contexts, it is strongly advised to engage external investigators. This is primarily done through established law firms or legal NGOs with experience in safeguarding/PSEAH/GBV cases. The advantage of external investigators is that it reassures our Boards and Donors that the case was examined without influence or prejudice. In most countries, attorney-client privilege ensures confidentiality.

All country offices must identify a source for external investigations within their context that can operate in local languages and with awareness of local custom regarding PSEAH issues to avoid placing complainant/survivor at additional risk.

11.8 Completed Investigations

Once the full internal investigation or external investigation has been completed and a report issued, the Safeguarding Panel will review the report and submit recommendations to the CEO for approval. This may include:

- Termination of employment of staff involved in complaint.
- Referral of perpetrator(s) to local authorities where doing so does not place complainant at additional risk.
- Penalties for office management team if negligence demonstrated in not applying Safeguarding/PSEAH policies and procedures.
- Immediate retraining of all staff on Safeguarding/PSEAH policy and procedures.
- Plans for longer term survivor support
- Review of safeguarding policy and procedures.

Note: All safeguarding/PSEAH cases and investigation results must be reported to the WfWI Boards as well as appropriate government agencies as necessary.

12. Country Safeguarding Self Assessments

All WfWI country offices, including GSC locations should be doing an annual self-assessment. These can also be done any time there are significant changes in the operating environment, or after an incident. Safeguarding is also an element in annual compliance checks carried out on each office so this process can prepare your staff and systems to successfully meet the required standards.

12.1 Country Office Self Assessments

Using the guide below, consider all the factors. It may help to use a scoring system for each bullet point in each category and see how you score. If each point is rated on a scale of 1-5, with one being not compliant and 5 being fully compliant, you can work out an overall percentage of compliance.

There are 15 bullet points in the chart below.

- A score 75 would demonstrate 100% effectiveness of your Safeguarding/PSEAH system.

- A score of 37.5 would equate to 50% effectiveness.

Obviously the ideal to be both effective and compliant would be a high or perfect score. This should be your goal. Resist the urge to give yourself better scores than you really deserve as this creates vulnerability and possible liability.

**SAFEGUARDING/PSEAH COUNTRY OFFICE
SELF ASSESSMENT**

1 = Not compliant
5 = Fully compliant

<p>Country Office Management</p> <p><i>If the answer is yes to all of these points you are doing well!</i></p>	<p>Has the CO Leadership Team done the following:</p> <ul style="list-style-type: none"> -Researched and understood the legal framework within your country? 	Score 1-5
	<ul style="list-style-type: none"> -Has the Leadership Team identified, trained and effectively supported a Safeguarding Focal Point? 	
	<ul style="list-style-type: none"> -Has the Leadership Team allocated budget for Safeguarding /PSEAH capacity building? 	
	<ul style="list-style-type: none"> -Has an external investigation partner been identified? 	
	<ul style="list-style-type: none"> -Are new staff trained on Safeguarding/PSEAH as part of their onboarding? 	
	<ul style="list-style-type: none"> -Are adequate background checks being done on any new hires, especially those who will work with women or adolescent girls? 	

<p>Country Office Staff</p> <p><i>If you can say your staff are up to date on all these your are in good shape!</i></p>	<ul style="list-style-type: none"> - Have all your staff read the Safeguarding Policy and signed their acceptance form? 	
	<ul style="list-style-type: none"> - Have all staff been put through annual (at minimum) safeguarding/PSEAH annual training 	
	<ul style="list-style-type: none"> -Have all staff been trained on Psychological First Aid so they are prepared if someone comes to them with a complaint? 	
	<ul style="list-style-type: none"> -Are all staff aware that they MUST report any Safeguarding/PSEAH concerns they have to the Focal Point? 	

<p>Country Office Reporting</p> <p><i>If you are confident your reporting systems are open, secure and being checked regularly then you are much more likely to be on top of the situation!</i></p>	<ul style="list-style-type: none"> -Do you have multiple options for staff, participants and community members to submit complaints? 	
	<ul style="list-style-type: none"> -Have you ensured that these systems are safe from tampering or manipulation? 	
	<ul style="list-style-type: none"> -Do staff and participants know who they should make a complaint to? 	
	<ul style="list-style-type: none"> -Is your Safeguarding Focal Point given the dedicated time to monitor reporting channels, manage complaints and conduct preliminary investigations? 	
	<ul style="list-style-type: none"> -Are you confident that cases or complaints are actually being reported (no complaints does not mean no cases!) 	

Total

Out of 75 max score

13. Notes for Survivors

If you feel you are a victim of Safeguarding/PSEAH violations, or have witnessed behaviour in others that qualifies as violation:

- Read our Safeguarding/PSEAH policy and these guidelines to fully understand what your rights are and what the rules are.
- If you feel you are being victimized document everything. Include:
 - Times, dates, locations, any context of the situation
 - Who was present, what others may have witnessed.
 - Words or actions by the perpetrator as best you can recall.
 - Copies of any emails, texts or other messages that could be evidence
 - How the incident made you feel, any health issues resulting, any other concerns you might have.
 - Any actions you took, such as telling someone that they were making you feel uncomfortable or warning someone their behaviour was inappropriate.
 - Who you reported concerns to and when/how you reported it.
 - Any other information that could help an investigation
- It may happen that writing down details of an attack or frightening behaviour can cause you to relive the experience and trauma. Be careful of this and do not push yourself. Seek help if you need it. If it helps, remember you are not just doing this for yourself, but to protect all the others who may be possible victims.
- Remember always you are a survivor.

14. Guidelines Summary

It is important to emphasize how critical to WfWI Safeguarding/PSEAH is. We are given a high level of trust by our program participants, communities we work in, our staff our donors and our supporters. Our moral authority to support women and advocate for their empowerment is built on a foundation of trust. Breaking faith with all of those who trust us by allowing any Safeguarding/PSEAH incidents or behaviour would be a tragedy. All managers and staff need to keep Safeguarding/PSEAH in mind any time we interact with our participants or communities we serve. Be aware, be vigilant and be courageous in preventing these incidents or situations.