



Safeguarding Policy

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1. Introduction

1.1. Policy Statement

The statements below guide SDDirect's approach to safeguarding:

SDDirect is committed to the safety and rights of all individuals regardless of their gender, age, race, ethnicity, impairment needs, gender identity, sexual orientation or religion and intends that their welfare will always be the paramount consideration in its work. SDDirect has a zero-tolerance approach to all forms of violence, abuse, exploitation and harassment and will work to ensure that, where possible, all women, men, boys, girls and non-binary individuals¹ are kept safe from all forms of avoidable harm that is caused by SDDirect staff and representatives as well as its activities² and communications.

SDDirect uses a wide definition of violence, abuse, exploitation and harassment. This definition includes sexual, physical, emotional and economic violence, exploitation, abuse and harassment.

SDDirect recognises that all forms of violence, abuse, exploitation and harassment, and therefore all safeguarding concerns, are rooted in power imbalances and in inequality more broadly. As an international development actor, SDDirect does not permit its staff to abuse power differentials against colleagues or project-affected communities.

SDDirect recognises that all forms of violence, abuse, exploitation and harassment are a manifestation of power imbalances and the choice by perpetrators to abuse power imbalances. When perpetrated within the Overseas Development Assistance sectors, power imbalances can be based within a wide range of intersecting inequalities, notably:

- structural inequalities (e.g., gender, race, sexual orientation, disability status, geography),
- hierarchical inequalities (e.g., between colleagues, between staff member at lead and partner organisations)
- situational inequalities (e.g., between staff and project-constituents)

Examples of unequal power relationships that are relevant to SDDirect may include relationships between manager/supervisor and staff member, between a SDD staff member and staff from a local NGO, or between staff member and programme recipients in a rural community.

SDDirect recognises that incidents of violence, abuse, exploitation and harassment can be one-off or they can occur on a continuum where different forms of violence, abuse,

¹ SDDirect considers transwomen to be women and transmen to be men.

² Activities and communications include all initiatives that SDDirect staff and representatives are engaged in, this includes but is not limited to face-to-face trainings, public online webinars / meetings, research methods, written publications and social media content.

exploitation and harassment manifest in different ways. For example, if one form of exploitation of a power imbalance has become normalised or is routine within an organisation, there can be an increased risk that power imbalances will be exploited further and cause additional harm.

SDDirect recognises that due to systemic inequality and discrimination within different societies, some people are more at risk of violence, abuse and other harms than others and therefore may need additional support. SDD recognises that identity characteristics can intersect to affect a person's risk. SDD notes that children face unique risks due to their physical and mental immaturity and require special safeguards and care. SDD also notes that adults at-risk face unique risks, also requiring specific safeguards and care. SDDirect further notes that women and girls are at particular risk of violence, abuse, exploitation and harassment based on gender inequality. Therefore, SDDirect recognises that victims or survivors of different forms of violence, abuse, exploitation and harassment will have different capacities and support needs.

SDDirect recognises that violence, abuse, exploitation and harassment can occur in person and in digital environments or across both settings. For example, a staff member can abuse a person in a digital environment. SDDirect notes that access to internet and digital technology is expanding across the world and the use of the internet and digital technology is increasing within the Overseas Development Assistance sector.

SDDirect understands that prioritising safeguarding against violence, abuse, exploitation and harassment within its organisational culture is critical for the safety and wellbeing of staff and for others who engage with SDDirect. SDDirect understands the close connection between its Equality, Diversity and Racial Justice initiatives and safeguarding. An organisational culture that is diverse, inclusive, explains expected behaviours and how misbehaviours are dealt with, challenges inappropriate behaviour and creates comfortable and friendly spaces for people to speak up, can help prevent violence, abuse, exploitation and harassment.

1.2. Purpose of Policy

The principal aim of this policy and subsequent practice is to protect staff, representatives and anyone who engages with SDDirect from violence, abuse, exploitation and harassment caused by SDDirect staff and representatives, as well as as a result of its activities and communications. The policy also aims to ensure that measures to prevent violence, abuse, exploitation and harassment are put in place and that incidents of violence, abuse, exploitation and harassment are reported, received and responded to in an appropriate way.

The safeguarding policy is a comprehensive, overarching policy. The policy does not cover concerns regarding allegations of illegal and improper conduct and wrongful acts including, but not limited to, suspected fraud, criminal activity, miscarriages of justice. Please refer to SDDirect's Whistleblowing Policy and Anti-Bribery and Corruption Policy.

1.3. Key Definitions

Below are some key definitions. For a full list of definitions, see Annex 1.

Adult at risk

Any person who is aged 18 years or over and who is at risk of abuse or neglect because of their needs for care and support. This can include for mental health issues, learning or physical disability, sensory impairment, age or illness and who is or may be unable to take care of themselves or are unable to protect themselves against significant harm or exploitation. (Care Act 2014 [England]).

Child

A person under the age of 18 regardless of the age of majority in country.³

Child sexual abuse

When a child is forced or persuaded to take part in sexual activities. This may involve physical contact or non-contact activities.⁴

Child sexual exploitation

"Is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity: (a) in exchange for something the victim needs or wants; and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology."⁵

Child Abuse

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or by another child or children. Child Abuse can be physical, sexual, emotional or through purposeful or unintentional neglect.

Child Exploitation

Refers to the use of children for someone else's advantage, gratification or profit often resulting in unjust, cruel and harmful treatment of the child. These activities are to the

³ Convention on the Rights of the Child.

⁴ UNICEF. Forthcoming. Review of national educational strategies to prevent child sexual abuse and exploitation in East Asia and the Pacific. Bangkok: UNICEF

⁵ UNICEF. Forthcoming. Review of national educational strategies to prevent child sexual abuse and exploitation in East Asia and the Pacific. Bangkok: UNICEF

detriment of the child's physical or mental health, education, moral or social-emotional development.

Complainant

The person/s who file a complaint regarding wrongdoing (see below for definition of 'wrongdoing'). This can be the alleged survivor or may be a witness or another person who becomes aware of the wrongdoing.

Do No Harm

To '*do no harm*' means to avoid causing damage and suffering, through action or inaction, as a result of SDDirect activities.

Gender-based violence (GBV)

An umbrella term for any harmful act that is perpetrated against a person's will and which is based on socially constructed and ascribed differences in power between men and women. Although violence may be based on a number of inequalities, the inequality between men and women in society is focused on within the definition of GBV. Inequalities based on power, fluctuate over time and location. Frequently perpetrated types of GBV and the acceptability of GBV shift from context-to-context. Gender-based Violence is a continuum and includes (but is not limited to) acts that inflict physical, sexual or mental harm or suffering, threats of such acts, coercion, harassment, psychological abuse and other deprivations of liberty. These acts can occur in public or private. The term "GBV" is most commonly used to underscore how systemic inequality between men and women, which exists in every society in the world, acts as a unifying and foundational characteristic of most forms of violence perpetrated against women and girls.

It is important to acknowledge that men, women, boys, girls and non-binary individuals all can experience violence, but to date GBV research, policymaking and programming has largely focused on women and girls, as structural and systemic gender inequality privileges men with greater power and resources which renders women and girls at greater risk of violence being perpetrated against them. SDDirect acknowledges that non-binary individuals – particularly those who are perceived incorrectly to be female presenting – are also at increased risk of GBV (often intersecting with SOGIESC-based violence).

Harassment in the Workplace

Any form of behaviour that is unwelcomed, unsolicited, unreciprocated and may be repeated. It is behaviour that is likely to offend, humiliate, or intimidate. It can make it difficult for effective work to be done by the staff member or groups targeted or affected by this behaviour. For harassment to occur, there does not have to be an intention to offend or harass. It is the impact of the behaviour on the person who is receiving it, together with the nature of the behaviour, which determines whether it is harassment.

Safeguarding

Preventing and responding to harm caused by violence, exploitation, abuse and harassment.

The aim is to minimise the likelihood and impact of these actions towards both the people we are trying to help, and also people who are working in the sector. Child safeguarding refers explicitly to the protection of children. SDDirect uses the term Child Safeguarding to refer to action that is taken to promote the welfare of children, protect them from harm – directly or indirectly – and respond to violence, exploitation, abuse and harassment perpetrated by SDDirect staff or representatives.

Sexual exploitation, abuse and sexual harassment (SEAH)

SEAH is the term used to refer to sexual exploitation, abuse and sexual harassment. Although sexual exploitation, abuse and harassment can happen anywhere in society, when used as an umbrella term within the Overseas Development Assistance (ODA) sector, the term refers to acts of SEAH perpetrated by those working in, with or through, ODA actors and their projects.

SEAH, in the way used within the ODA sector, always occurs in a work environment, including a program setting or work travel. It can occur in any context. Service users, members of the community and staff working in the ODA sector are vulnerable to experiencing SEAH.

As SEAH is most often perpetrated against women and girls, it is most often a form of GBV. However, *it may not always be a form of GBV*. Sexual violence can be perpetrated based on other issues of inequality. For example, where a woman who is an international member of staff sexually harasses a junior, national member of staff. Within this example, the harassment is not rooted in gender inequality and gender discrimination, but rather deep rooted harmful cultural norms related to nationality, race and colonialism. Sexual violence perpetrated against a man with a disability may be based on that individual's disability as inequality. GBV additionally does not cover all forms of sexual violence against children, including paedophilia and other sexual interest in children and adolescents.

The individual terms within SEAH are defined below.

- a) Sexual exploitation:** Sexual exploitation “means any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including but not limited to profiting monetarily, socially, or politically from the sexual abuse of another.
- b) Sexual abuse:** The term sexual abuse means the actual or threatened physical intrusion of a sexual nature, whether by force or unequal or coercive conditions”.⁶ This includes paying a person or exchanging goods, materials or power for sex.
- c) Sexual harassment:** Sexual harassment at work is “any unwelcome conduct of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment”.⁷ However, sexual

⁶ UN Secretary-General's Bulletin (2003), Special measures for protection from sexual exploitation and sexual abuse, [ST/SGB/2003/13](#)

⁷ UN Secretary-General's bulletin (2019), Addressing discrimination, harassment, including sexual harassment, and abuse of authority, [ST/SGB/2019/8](#)

harassment can occur outside the workplace and outside working hours, including during official travel, social functions related to work or online.

Sexual harassment at work may also include the disclosure, or discussion of, an individual's sexual orientation or gender-identity without an individual's express permission.

Sexual harassment can take the form of isolated incident or repeated incidents. Sexual harassment can occur outside of the workplace. It does not need to be between colleagues and can occur within society in general.

Sexual harassment can involve teasing, offhand comments or sexualized 'jokes' or gestures and may involve any conduct of a verbal, non-verbal or physical nature.

Sexual harassment perpetrated by SDDirect staff or representatives against a project-affected community member is also covered by this policy.

The different areas of safeguarding considered within this policy include:

- Safeguarding children and adults at-risk
- Safeguarding against sexual exploitation, abuse and sexual harassment
- Do no harm
- Safeguarding and communications
- Safeguarding and Human Resources

For SDDirect's Code of Conduct, see Annex 2.

1.4. Scope of Policy

- The policy covers all personnel (referred to throughout the policy as 'staff and representatives') employed or engaged by SDDirect in any activity, whether as staff or contractors or in any other paid or unpaid position, full time or part time.
- The policy is applicable inside and outside of working hours, 24 hours a day, 7 days a week.
- A breach of this policy may result in disciplinary action.

1.5. External Standards and Laws

This policy was informed by the following international standards and recommendations:

- Inter-Agency Standing Committee (IASC), [Six Core Principles Relating to Sexual Exploitation and Abuse](#)
- Inter-Agency Standing Committee (IASC) Minimum Operating Standards: [Protection from Sexual Exploitation and Abuse by Own Personnel \(MOS-PSEA\)](#)
- Core Humanitarian Standard (CHS) on [Quality and Accountability](#)
- Keeping Children Safe (KCS), [International Child Safeguarding Standards](#)

- Development Assistance Committee (DAC) [Recommendation on Ending Sexual Exploitation, Abuse, and Harassment in Development Co-operation and Humanitarian Assistance](#)

As SDDirect is based in the UK, the following UK Laws and guidance have informed the policy:

- UK Charity Commission, [Regulatory alert to overseas aid charities](#)
- UK Charity Commission, [Serious Incident Reporting](#)
- [Safeguarding Vulnerable Groups Act](#), 2006
- [Sexual Offences Act](#), 2003
- [Protection of Freedoms Act](#), 2012

2. SDDirect Safeguarding Commitments

2.1. Zero tolerance of abuse and exploitation

- SDDirect has a zero-tolerance approach to all forms of violence, abuse, exploitation and harassment. SDDirect defines zero-tolerance as acting on every allegation in a fair, timely and reasonable manner with due regard for procedural fairness.
- SDDirect has a code of conduct which all staff and representatives must sign and comply with at all times. Any staff member who is not sure how the code of conduct applies to them is obliged to ask their manager. Breach of this safeguarding policy and / or the code of conduct may result in disciplinary action.

2.2. Risk-based approach to safeguarding

- Across its portfolio and where possible, SDDirect will identify, mitigate and manage or reduce the safeguarding risks for all SDDirect staff and representatives and everyone who interacts with SDDirect, including children and adults at-risk.
- Where possible, risk assessment and mitigation procedures will be consultative.
- Case handling procedures and investigations will identify, assess and mitigate the risks facing victims and survivors, Subjects of Concern and SDDirect.

2.3. Promote inclusion and respect the rights of all people without discrimination

- All staff and representatives should recognise and value the importance of having a diverse and inclusive organisation.
- We aim to ensure that all staff and representatives, activities and communications are inclusive and respect the rights of all people without discrimination.
- Refer to the Equality, Diversity and Racial Justice strategy for more information.

2.4. Embed a culture that prioritises safeguarding

- SDDirect understands that for the safeguarding policy to be well understood and effectively implemented, it is essential that staff and representatives are aware of the policy and are clear about how they can put the policy into practice.
- All new joiners receive a mandatory induction on the safeguarding policy within their probation period, or before travelling.
- All existing staff will receive training on the policy during probation period and with any updates to the policy to ensure comprehensive understanding of: i) how and when to report a concern, ii) the drivers of violence, abuse, exploitation and harassment, iii) potential signs and indicators of abuse, and iv) staff roles and responsibilities in receiving and reporting concerns.
- SDDirect will regularly communicate the messages in this policy and, where relevant, share (anonymous) lessons learned.

2.5. Embed a survivor-centred approach

- No one will be victimised for making a complaint and SDDirect has zero tolerance of retributive action taken against reporters / complainants. We will take all concerns seriously and carry out timely and robust responses to reports.
- We will work with reporters / complainants and victims or survivors to make sure that, where they would like, they are central to any response. We will aim to ensure that they are not further harmed or disempowered by any processes and that all case handling procedures are informed by a risk assessment.
- Where SDDirect receives a report of violence, exploitation, abuse and other harms, it will ensure that victims and survivors are referred to relevant service providers. Further, where SDDirect has an immediate duty of care to the survivor / victim (where they are a staff member or contractor) SDDirect will refer them to psychosocial support via the CIC Wellbeing service.
- SDDirect is committed to developing and updating a referral pathway for UK operations as well as for projects within other countries and contexts. SDDirect will work with partners to ensure whenever a staff member or contractor visits another organisations operations, they are aware of the safeguarding referral pathway and reporting mechanisms.
- Victim/survivors have the right to decide if they would like to be involved in any investigation or not. Where victim/survivors do not want an investigation, SDDirect will consider whether an investigation should take place, including investigations which are conducted in such a way so as to maintain the anonymity of the survivor / victim. This will be carefully considered and risk assessed.
- SDDirect's commitment to prioritising the safety and needs of victims or survivors is reflected in other organisational policies, including Code of Conduct, Whistleblowing Policy, Resourcing, Due Diligence and Contracting Guidelines and our Health and Safety Policy.

2.6. Encourage to report

- All SDDirect staff and representatives are encouraged under this policy to report any disclosure or suspicion of violence, abuse, exploitation and harassment they come across when the Subject of Concern is a SDDirect staff or representative or the cause of abuse or harm is a SDDirect activity or communications.
- Reports can be shared in any way which the reporter / complainants or victim or survivor feel most comfortable. This may be through line management, to the Project Manager of a specific project, to a safeguarding focal point, directly to any member of the Executive Management Group (EMG), to the Board or through the whistleblowing email address. (Note: every project should have its own safeguarding focal point or reporting lines). All focal points and identified personnel who may receive a report will be trained specifically in how to engage with a survivor / victim, complainant / reporter, referrals that can immediately be made and internal reporting. SDD recognises that disclosing or reporting violence, abuse, exploitation and harassment through formal channels can be difficult for victims or survivors and is often a last resort. Accessible and informal discussion and support channels / “internal listeners” will be trained and provided to recognise this.
- If staff or representatives have concerns, suspicions or reports about the welfare or abuse of any children and at-risk adults, they are obliged under the principles of this policy and focus of SDDirect’s work to report these concerns to the SDDirect or project safeguarding focal point (even if SDDirect is not the cause). The safeguarding focal point should then refer or report the child or at-risk adult to relevant local services for support. This should only be avoided in cases where the referral or onward reporting may cause significant risk of harm for the child or adult at-risk.
- All staff and representatives should be made aware of any report or allegation that has been made against them and that this will require an investigation – when this it is safe to do to (based on a risk assessment which covers risk to the survivor, risk to the Subject of Concern and risk to the integrity of an investigation). The same applies to former staff and representatives if the allegation is made about them whilst they were working for SDDirect.
- Where necessary, SDDirect will report serious incident reports that are related to safeguarding to the UK Charity Commission and to donors and others as contractually required. Where a report relates directly to SDDirect, we will use the established reporting mechanisms through Plan International UK, our parent organisation.
- It is also possible to contact FCDO’s Internal Audit Directorate’s fraud and safeguarding investigation team to raise concerns, suspicions and/or allegations of fraud, sexual exploitation and abuse or other corrupt practices. This includes both internal and external cases where FCDO funds, assets or interests (including FCDO’s reputation) are involved, as well as any breach of the Civil Service Code. The fraud and safeguarding investigation team has a dedicated secure email address for raising all concerns: reportingconcerns@fcdo.gov.uk. Alternatively, concern can be reported by calling the confidential hotline on +44 (0)1355 843747 or writing to the Director of Internal Audit and Investigations, Foreign, Commonwealth and Development Office, King Charles Street, Whitehall, London, SW1A 2AH, United Kingdom.

2.7. Confidential case handling and robust investigations

- SDDirect is committed to responding effectively, sensitively and swiftly to all reports, disclosures and suspicions of violence, abuse, exploitation and harassment.
- SDDirect commits that all reports, disclosures and suspicions of violence, abuse and other harms it receives will follow the same / similar case handling procedures regardless of the type of abuse and who the report is coming from. Case handling procedures, managed by the SDDirect Focal Point and Managing Director, will be created for the setting that you are based in.
- Where children or at-risk adults are parties to the incident (victim or survivor, witnesses or perpetrator), SDDirect will ensure that individuals with experience of supporting children or at-risk adults are involved in the case handling team and that they lead the engagement with the children or at-risk adults.
- SDDirect commits to investigating reports with the same rigor as applied to other disciplinary investigations. All investigators should be trained specifically in safeguarding investigation and have received training in the internal investigation process. Investigations should be managed and documented clearly.
- SDDirect recognises its obligations to process case-related data in line with existing relevant data protection legislation, this includes a duty to protect personal data against any unauthorised or unlawful processing and any accidental loss or destruction of, or damage to, the personal data. Refer to SDDirect's data protection policy.

2.8. Good governance and accountability

- The Head of Programmes has overall responsibility for making sure that the safeguarding policy is implemented. As a wholly owned subsidiary of Plan International UK, SDDirect is ensuring that our processes input directly into PIUK's established safeguarding reporting procedures and oversight by its Board of Trustees.
- SDDirect charges all EMG Members to make their teams aware of the policy and to work in accordance with it.
- The Head of Programmes is responsible for the day-to-day support to employees and contractors to ensure the correct processes are in place to provide visibility through training and awareness raising. The Head of Programmes is also responsible for escalated concerns from any member of staff or contractors. Reporting to the Charity Commission takes place via the Board and PIUK established procedures.
- All staff and representatives are obliged to create and maintain a working environment and culture that prevents exploitation and abuse.

2.9. Integrate safeguarding into Human Resources

- Recruitment procedures from job advertising, interviewing, selection and onboarding will integrate safeguarding considerations, where possible. See the Resourcing, Due Diligence and Contracting Guidelines for more detail.
- All Line Managers are responsible for performance management of staff, ensuring that safeguarding competencies are met and support is provided where there are concerns or questions.

2.10. Integrate safeguarding into media and communications

- SDDirect recognises that different safeguarding risks are associated with different media and communications methods, messages and audiences. SDDirect will assess the safeguarding risks of different media and communications work so that they do no harm. Decisions should always favour the safety and protection of those at risk of violence, abuse, exploitation and harassment.
- SDDirect will exercise sensitivity and caution in determining the appropriateness and suitability of stories and images, in line with the safeguarding principles contained in this policy and the media communications guidelines.
- SDDirect shall only use photos and direct quotes supplied by partners that comply with the media and communication guidelines, this includes ensuring informed consent from children and parents / caregivers and of adults as appropriate.
- SDDirect may, on occasion use photographs from other sources but in all cases the criteria outlined in this policy will apply, and any photographers will be fully briefed and required to comply with this policy.

2.11. The organisations we choose to work with should prioritise safeguarding

- It is the responsibility of the sub-contractors and primes that we work with to make sure that they put in place a policy and processes that prioritise safeguarding. Should SDDirect find that a partner does not take safeguarding seriously or that steps to strengthen its safeguarding measures are insufficient, SDDirect may cease funding or not work with them again.
- Where necessary, SDDirect will support sub-contractors to strengthen their safeguarding measures and will welcome advice from sub-contractors on how to strengthen its own safeguarding measures.
- SDDirect will make fund recipients and primes aware of its policy so they may hold SDDirect staff and contractors accountable as appropriate.
- Any staff member or representatives working for a sub-contractor or prime can report (or whistle blow) to SDDirect if the sub-contractor or prime is not complying with its

own policy. In such situations, SDDirect should advise the sub-contractor or prime of the report. SDDirect would expect the same cooperation in return.

- Refer to the Supply Chain Policy for more information.

2.12. Do no harm

- Projects will be designed in such as way as to avoid doing harm which results in acts of violence, abuse, exploitation and harassment.

Annex 1: Full Definitions

Adult at risk

Any person who is aged 18 years or over and who is at risk of abuse or neglect because of their needs for care and support. This can include for mental health issues, learning or physical disability, sensory impairment, age or illness and who is or may be unable to take care of themselves or are unable to protect themselves against significant harm or exploitation. (Care Act 2014 [England]).

Child

A person under the age of 18 regardless of the age of majority in country.⁸

Child sexual abuse

When a child is forced or persuaded to take part in sexual activities. This may involve physical contact or non-contact activities.⁹

Child sexual exploitation

"Is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity: (a) in exchange for something the victim needs or wants; and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology."¹⁰

Child Abuse

⁸ Convention of the Rights of the Child

⁹ UNICEF. Forthcoming. Review of national educational strategies to prevent child sexual abuse and exploitation in East Asia and the Pacific. Bangkok: UNICEF

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A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or by another child or children. Child Abuse can be physical, sexual, emotional or through purposeful or unintentional neglect.

Child Exploitation

Refers to the use of children for someone else's advantage, gratification or profit often resulting in unjust, cruel and harmful treatment of the child. These activities are to the detriment of the child's physical or mental health, education, moral or social-emotional development.

Child Protection

SDDirect uses the term 'child protection' to refer to preventing and responding to violence, exploitation and abuse against children – including commercial sexual exploitation, trafficking, child labour and harmful traditional practices, such as female genital mutilation/cutting and child marriage. SDDirect acknowledges that many of our projects target children who are uniquely vulnerable to abuses, such as when living without parental care, in conflict with the law, in armed conflict contexts, street children and are particularly vulnerable to child protection concerns due to identity, social and geographical determinants – notably gender and disability status. Violations of the child's right to protection take place in every country and are under-recognised and under-reported. Children subjected to violence, exploitation, abuse and neglect are at risk of death, poor physical health, poor mental health, developmental delays, HIV/AIDS infection, displacement, homelessness and other issues. The impacts may last for their entire lives, including affecting their parenting skills in later life.

Complainant

The person/s who file a complaint regarding wrongdoing (see below for definition of 'wrongdoing'). This can be the alleged survivor or may be a witness or another person who becomes aware of the wrongdoing.

Disclosure

The process of revealing information. Disclosure about abuse can be directly or indirectly communicated. The term disclosure is preferred over identification as it indicates that the individual sharing details of an incident or concern has decided to discuss the incident with the organisation. An individual who discloses may become a complainant.

Discrimination

Refers to treating a person, or a group of people less favourably than another person or group based on protected characteristics, as listed in the UK Equality Act (2010) and affiliation to unions or groups, perceived class status, educational background or political belief.

Do No Harm

To '*do no harm*' means to avoid causing damage and suffering, through action or inaction, as a result of SDDirect activities.

Gender

The socially constructed roles, attributes, opportunities and relationships that a given society considers appropriate for men and women. These expectations differ from society to society and change over time. In many societies, it has been recognized that there are more than two genders. However, "men/boys" and "women/girls" are the most commonly recognized genders and are, therefore, used throughout this guidance.¹¹

Gender-based violence (GBV)

An umbrella term for any harmful act that is perpetrated against a person's will and which is based on socially constructed and ascribed differences in power between men and women. Although violence may be based on a number of inequalities, the inequality between men and women in society is focused on within the definition of GBV. Inequalities based on power, fluctuate over time and location. Frequently perpetrated types of GBV and the acceptability of GBV shift from context-to-context. Gender-based Violence is a continuum and includes (but is not limited to) acts that inflict physical, sexual or mental harm or suffering, threats of such acts, coercion, harassment, psychological abuse and other deprivations of liberty. These acts can occur in public or private. The term "GBV" is most commonly used to underscore how systemic inequality between men and women, which exists in every society in the world, acts as a unifying and foundational characteristic of most forms of violence perpetrated against women and girls.

It is important to acknowledge that men, women, boys, girls and non-binary individuals can experience violence, but to date GBV research, policymaking and programming has largely focused on women and girls, as structural and systemic gender inequality privileges men with greater power and resources which renders women and girls at greater risk of violence being perpetrated against them. SDDirect acknowledges that non-binary individuals – particularly those who are perceived incorrectly to be female presenting – are also at increased risk of GBV (often intersecting with SOGIESC-based violence).

Gender expression

Gender expression is each person's presentation of the person's gender through physical appearance – including dress, hairstyles, accessories, cosmetics – and mannerisms, speech, behavioural patterns, names and personal references. Gender expression may or may not conform to a person's gender identity.¹²

Gender Identity

¹¹ Neville, S., Salam, T., Naidu, V. and Fraser, E., 2020. *Addressing Gender-Based Violence and Harassment, Emerging Good Practice for the Private Sector*. [ebook] EBRD, CDC, IFC. Available at: <https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/publications/publications_gpn_addressinggbvh> [Accessed 5 March 2021].

¹² International Labour Organization, 2019. *Information paper on protection against sexual orientation, gender identity and expression and sexual characteristics (SOGIESC) discrimination*. 1st ed. [ebook] International Labour Organization. Available at: <https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---normes/documents/publication/wcms_700554.pdf> [Accessed 3 June 2021].

Gender identity is understood to refer to each person's deeply felt internal and individual experience of gender, which may or may not correspond with the sex assigned at birth, including the personal sense of the body (which may involve, if freely chosen, modification of bodily appearance or function by medical, surgical or other means) and other expressions of gender, including dress, speech and mannerisms.¹³

Harassment in the Workplace

Any form of behaviour that is unwelcomed, unsolicited, unreciprocated and may be repeated. It is behaviour that is likely to offend, humiliate, or intimidate. It can make it difficult for effective work to be done by the staff member or groups targeted or affected by this behaviour. For harassment to occur, there does not have to be an intention to offend or harass. It is the impact of the behaviour on the person who is receiving it, together with the nature of the behaviour, which determines whether it is harassment.

Inclusion

Ensuring all are valued, respected and supported.

Informed Consent

Consent is when a person makes an informed choice to agree freely and voluntarily to do something. There is no consent when agreement is obtained through: the use of threats, force or other forms of coercion, abduction, fraud, manipulation, deception, or misrepresentation; the use of a threat to withhold a benefit to which the person is already entitled; or a promise is made to the person to provide a benefit.¹⁴

Mitigation of SEAH

Refers to reducing the risk of exposure to SEAH. This may be through increased lighting on an infrastructure project, or ensuring that well-lit, lockable latrines are put in place on projects. Mitigation work centers around working with women and girls and other at-risk populations in the design of projects and to map SEAH issues with them, identify SEAH hotspots on a regular basis and seeking to mitigate risk of SEAH in those locations through project activities. Mitigation work seeks to reduce the risk of SEAH occurring or of being exacerbated by project activities or actions.

Non-binary/third gender

Terms used to describe people whose gender identity falls outside the male–female binary; can also describe persons who identify as both male and female (bigender), do not identify with any gender (agender) or identify as a mix of different genders (e.g. male, female and agender on different days).¹⁵

¹³ Ibid

¹⁴ OCHA, UNHCR, IRC [The GBV IMS, GBV Classification Tool](#), 2006.

¹⁵ Ibid

Prevention of SEAH

Refers to taking action to stop SEAH from first occurring (e.g. scaling up activities that promote gender equality or address practices that contribute to SEAH).¹⁶ This could be through supporting gender equality focused programming, social norms or behaviour change communication work. Prevention of SEAH seeks to stop SEAH from taking place.

Potential Wrongdoing/ Wrongdoing

A claim that an individual or group of individuals has done something which is 'wrong' and breaches code of conduct or other safeguarding policy – but there is not yet evidence that this claim is true.

Response to SEAH

Responding to allegations, issues and concerns regarding SEAH in a comprehensive manner including (but not limited to): setting up and promoting accessible reporting mechanisms, which are tested and monitored on a regular basis; being able to refer a survivor to appropriate and safe services; undertaking timely and transparent investigations into allegations.

Safeguarding

Preventing and responding to harm caused by violence, exploitation, abuse and harassment.

The aim is to minimise the likelihood and impact of these actions towards both the people we are trying to help, and also people who are working in the sector. Child safeguarding refers explicitly to the protection of children. SDDirect uses the term Child Safeguarding to refer to action that is taken to promote the welfare of children, protect them from harm – directly or indirectly – and respond to violence, exploitation, abuse and harassment perpetrated by SDDirect staff or representatives.

Sex

Refers to the biological differences that act as a marker upon which male or female sex is assigned at birth.¹⁷

Sex characteristics

Sex characteristics are each person's physical features relating to sex, including genitalia and other sexual and reproductive anatomy, chromosomes, hormones and secondary physical features emerging from puberty.¹⁸

Sexual exploitation, abuse and sexual harassment (SEAH)

¹⁶ Inter-Agency Standing Committee. 2015. Guidelines for Integrating Gender-Based Violence Interventions in Humanitarian Action: Reducing risk, promoting resilience and aiding recovery

¹⁷ Ibid

¹⁸ Ibid

SEAH is the term used to refer to sexual exploitation, abuse and sexual harassment. Although sexual exploitation, abuse and harassment can happen anywhere in society, when used as an umbrella term within the Overseas Development Assistance (ODA) sector, the term refers to acts of SEAH perpetrated by those working in, with or through, ODA actors and their projects.

SEAH, in the way used within the ODA sector, always occurs in a work environment, including a program setting or work travel. It can occur in any context. Service users, members of the community and staff working in the ODA sector are vulnerable to experiencing SEAH.

As SEAH is most often perpetrated against women and girls, it is most often a form of GBV. However, *it may not always be a form of GBV*. Sexual violence can be perpetrated based on other issues of inequality. For example, where a woman who is an international member of staff sexually harasses a junior, national member of staff. Within this example, the harassment is not rooted in gender inequality and gender discrimination, but rather deep rooted harmful cultural norms related to nationality, race and colonialism. Sexual violence perpetrated against a man with a disability may be based on that individual's disability as inequality. GBV additionally does not cover all forms of sexual violence against children, including paedophilia and other sexual interest in children and adolescents.

The individual terms within SEAH are defined below.

- d) Sexual exploitation:** Sexual exploitation “means any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including but not limited to profiting monetarily, socially, or politically from the sexual abuse of another.
- e) Sexual abuse:** The term sexual abuse means the actual or threatened physical intrusion of a sexual nature, whether by force or unequal or coercive conditions”.¹⁹ This includes paying a person or exchanging goods, materials or power for sex.
- f) Sexual harassment:** Sexual harassment at work is “any unwelcome conduct of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment”.²⁰ However, sexual harassment can occur outside the workplace and outside working hours, including during official travel, social functions related to work or online.

Sexual harassment at work may also include the disclosure, or discussion of, an individual's sexual orientation or gender-identity without an individual's express permission.

Sexual harassment can take the form of isolated incident or repeated incidents. Sexual harassment can occur outside of the workplace. It does not need to be between colleagues and can occur within society in general.

¹⁹ UN Secretary-General's Bulletin (2003), Special measures for protection from sexual exploitation and sexual abuse, [ST/SGB/2003/13](#)

²⁰ UN Secretary-General's bulletin (2019), Addressing discrimination, harassment, including sexual harassment, and abuse of authority, [ST/SGB/2019/8](#)

Sexual harassment can involve teasing, offhand comments or sexualized 'jokes' or gestures and may involve any conduct of a verbal, non-verbal or physical nature.

Sexual harassment perpetrated by SDDirect staff or representatives against a project-affected community member is also covered by this policy.

Sexual orientation

Sexual orientation is understood to refer to each person's capacity for profound emotional, affectional and sexual attraction to, and intimate and sexual relations with, individuals of a different gender or the same gender or more than one gender.²¹

SOGIESC

An acronym for sexual orientation, gender identity and expression, and sexual characteristics.²²

Staff and representatives

Any person employed by or contracted through SDDirect

Subject of concern

The individual or group of individuals who have been accused of wrongdoing and breaches code of conduct – but there is not yet evidence that this claim is true.

Survivor-centered approach

A survivor-centered approach is based on a set of principles: (1) privacy; (2) confidentiality; (3) agency; (4) dignity; (5) respect; (6) non-discrimination. A survivor-centered approach guides professionals - regardless of their role - in their engagement with survivors who have experienced sexual or other forms of violence. The survivor-centered approach aims to create a supportive environment in which the survivor's interests are respected and prioritized, and in which the survivor is treated with dignity and respect. The approach helps to promote the survivor's recovery and ability to identify and express needs and wishes, as well as to reinforce the survivor's capacity to make decisions about possible interventions.²³

Transgender

An umbrella term used to describe a wide range of identities whose appearance and characteristics are perceived as gender atypical - including transsexual people, cross-dressers (sometimes referred to as "transvestites"), and people who identify as third gender.²⁴

²¹ Ibid

²² Ibid

²³ World Bank. 2018. Good Practice Note Addressing Gender-based Violence In Investment Project Financing involving Major Civil Works. Washington

²⁴ UN Free & Equal, 2021. *UN Free & Equal | Definitions*. [online] UN Free & Equal. Available at: <<https://www.unfe.org/definitions/>> [Accessed 5 March 2021].

Victim/Survivor

We use the term victim or survivor to describe the person who has experienced violence. The option of term gives the individual the choice.

Whistleblowing

When a worker passes on information concerning potential wrongdoing or actual wrongdoing which they feel is in the public interest.

Annex 2: Code of Conduct

This Code of Conduct provides expected standards of behaviour of SDDirect staff and representatives. This Code of Conduct is based on the principles outlined in the SDDirect Safeguarding Policy. SDDirect staff and representatives always represent the organisation and as such you will never be entirely 'off duty' so standards of behaviour must apply at all times. The below is not an exhaustive list and should be interpreted in a spirit of common sense.

A breach of the code of conduct or a misbehaviour can be reported and can result in disciplinary action. It should be noted that if concerns arise in relation to staff and representatives outside their professional roles (e.g. standards of behaviour that would constitute a breach of the Safeguarding Policy or the Code of Conduct) SDDirect would initiate follow up action, including possible disciplinary action.

As a staff member or representative of SDDirect, you are expected to uphold the organisation's principles. To maintain the expected standard of behaviour you will:

- Actively promote inclusion and respect the rights of all people without discrimination, whilst being sensitive to different cultures, norms and values. You can seek advice from SDDirect where you have questions or concerns. This includes:
 - Conduct all interactions (in person and online) in a way that is safe, inclusive and appropriate for all individuals involved. Be empathetic to everyone in the room or event.
 - Behave appropriately; make sure that language is moderated for who you are speaking to and refrain from jokes or comments that may cause discomfort or offence.
 - Maintain an environment which prevents violence, abuse and other harms, and promotes the implementation of this code of conduct. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.

Staff must:

- Uphold the rights and welfare of colleagues, representatives, project-affected communities.
- Read thoroughly, promote and raise awareness of all SDDirect's Safeguarding Policy.
- Ensure they are aware of their Safeguarding Focal Point and aware of reporting mechanisms.
 - Report any suspicions, concerns, or behaviours that breach the Safeguarding Policy to the appropriate person(s) where they feel it is safe to report.
 - Ensure they have received the relevant safeguarding training.
 - Maintain confidentiality regarding concerns and report concerns on a need-to-know basis only. This protects the dignity and identity of the alleged survivor/victim and the alleged wrongdoer.

Line Managers must:

- Create a safe environment where staff and others feel able to raise concerns without fear of retribution.
- Ensure that if a member of their team has reported a breach of safeguarding policy, that this is raised via the appropriate channels within 24 hours.
- Ensure all staff members and contractors that they manage are trained in Safeguarding Policy.
- Ensure that you are aware of referral services for health, legal and psychosocial support to provide to anyone disclosing (information to be supplied by SDDirect's Head of Programmes).
- Set a positive example both on and off duty.

When working with children or adults at risk staff must:

- Conduct interactions with children that are safe, appropriate, child-friendly and sensitive to the feelings of the child.
- Immediately report any concerns relating to the safety or welfare of a child and adult at risk.
- Do not work alone with children or adults at risk and plan your work so that at least two adults are present at any time.
- Behave appropriately; make sure that language is moderated in their presence and refrain from adult jokes or comments that may cause discomfort or offence.
- Avoid inappropriate physical contact with a child or adult at risk. Using common sense, this does not limit physical contact with a child or adult at risk if they are hurt or distressed. In this circumstance, a child may be comforted or reassured without compromising his/her dignity.
- Be sensitive to local norms and standards of behaviour towards children and adults at risk. Where local norms and standards of behaviour contravene this code of conduct SDDirect's standards take precedence.
- Listen to what children are saying, and respond appropriately.
- Never act in a way that may be abusive or may place them at risk of abuse.
- Not condone, nor participate in, behaviour against a child or adult at risk that is illegal, unsafe, abusive.
- Never hit or otherwise physically assault, harm or abuse them.
- Not develop physical/sexual relationships with them.
- Never verbally or physically act in a manner that is inappropriate or sexually provocative.
- Not develop relationships with them that could in any way be deemed exploitative or abusive.
- Not use language, make suggestions or offer advice that is inappropriate, offensive or abusive.
- Never act in ways intended to shame, humiliate, belittle or degrade children or adults at risk, or otherwise perpetrate any form of emotional abuse, discriminate against, show differential treatment, or favour particular children to the exclusion of others.
- Never allow allegations made by a child/adult at risk or concerns expressed by others about their welfare, to go unrecorded or not acted upon.
- Not do things for a child or adult at risk of a personal nature that they can do for themselves.

- Not have a child or adult at risk who are beneficiaries of SDDirect projects, stay overnight at your home or other personal accommodation in which you are staying.
- Never use any computer or other electronic device to view, download, distribute or create indecent or inappropriate images of children or adults at risk.
- Never engage in any commercially exploitative activities with children including child labour or trafficking.

SDDirect staff should engage in safeguarding against Sexual Exploitation, Abuse and Harassment by not:

- Engaging in any sexual activity with children (persons under the age of 18). This is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defence.
- Engaging in any sexual activity with an adult at risk who is unable to provide informed consent.²⁵
- Exchanging money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. This includes exchange of any assistance that is due to children or adults with whom we work.
- Engaging in any other form of sexual exploitation or abuse.
- Engaging in sexual harassment of any form, including but not limited to actions such as sexually-suggestive gestures, comments on a worker's appearance, age or private life, sexual comments, stories and jokes, unwanted sexual advances or revealing or discussing a person's sexual orientation or gender-identity without their express permission.
- Committing any act of gender-based violence.
- Engaging in any new sexual activity with staff members working with partners of SDDirect who are a 'sub' within a contracting relationship without first disclosing the relationship to their Line Manager. Existing relationships must be declared prior to working with the partner. This avoids situations which abuse power as well as conflict of interest issues. An exception to this rule may be made where one of the parties is at risk due to another inequality, such as diverse SOGIESC, where disclosure of a relationship will place them in potential danger. In circumstances such as this, it is expected that the SDDirect member submit a request at their earliest convenience.
- Engage in any other form of sexual exploitation or abuse against work colleagues, within SDDirect or partner organisations.
- Engage in any form of sexual relationship with a person that they line manage or supervise.
- Keep romantic and/or sexual relationships with other staff members secret from SDDirect. Relationships must be declared as soon as possible to their line managers, even if the relationship is at an early stage and may not continue. An exception to this rule may be made where one of the parties is at risk due to an inequality, such as diverse SOGIESC, where disclosure of a relationship will place them in potential

²⁵ Informed consent: permission granted in full knowledge of the possible consequences.

danger. In circumstances such as this, it is expected that HR is notified and worked with to find a solution to any power imbalances involved in working together.

- Engage in sexual harassment of any form, including but not limited to actions such as sexually-suggestive gestures, comments on a worker's appearance, age or private life, sexual comments, stories and jokes, unwanted sexual advances or revealing or discussing a person's sexual orientation or gender-identity without their express permission.

SDDirect staff should engage in protecting each other from bullying and harassment by not:

- Using offensive, derogatory language or intimidating actions or behaviours.
- Insulting or use threatening gestures, language (overt or implied) or continual and unwarranted.
- Being physically or emotionally abusive in any way.
- Shouting at any colleagues or members of project-affected communities.
- Using unjustified and/or unnecessary comments about a person's work or capacity for work.
- Openly displaying pictures, posters, graffiti, written materials, emails or digital media which might be offensive to some.
- Placing phone calls or send messages on voicemails or electronic mail or computer networks which are demeaning, threatening, abusive, humiliating, or offensive to staff.
- Persistently following or stalking within the workplace, or to and from work.
- Repeatedly assigning tasks or deadlines which are impossible to meet or inappropriate for the scope or seniority of their role in a way that is likely to undermine an individual's morale or sense of professional self-worth.
- Copying (Cc) emails that are critical about someone to others, who do not need to know or using blind copy (Bcc) on emails in a similar way.
- Making threats or comments about job security without foundation.
- Repeatedly changing workplace arrangements to inconvenience a particular employee.
- Repeatedly, excessively scrutinising a person's work over and above the scrutiny applied to others' work.
- Spreading malicious rumour.
- Cyber-bullying.

Annex 3: Reporting form

You may use this form to note your concerns about a breach of the Safeguarding Policy. This should be sent to SDDirect's Designated Safeguarding Officer (Head of Programmes) or, if you prefer to report confidentially, to plan@safecall.co.uk.

You do not need to use this form in order to report a concern, however please provide as much information from the form as possible as this will help us respond swiftly and appropriately.

Part One: About You

Name (optional):

Your role in or relationship to SDDirect (for example staff, contractor, fund recipient, corporate partner):

How can we contact you if we need more information to help the individual concerned?

Part Two: About the concerned individual

Who does the concern relate to (who is the victim/survivor)? *Note that this could be yourself.*

Name(s):

Male/Female/Non-binary/Other/Don't know:

Adult/child:

Address if know. If address is not known, how can we find this individual:

Part Three: About Your Concern (continue a separate sheet if necessary)

Date, time and place of any incident(s):

Nature of concern/allegation:

How did you come to have a concern: was abuse or harassment observed, experienced or suspected? Was an allegation made? Has someone disclosed abuse or harassment to you?

If another individual reported the incident to you directly, please write down exactly what was said:

Is there any other relevant information we should be aware of?

Have you reported the incident to anyone else? If yes, please specify

Time and date of reporting:

Person(s) to whom report was made:

Advice given by the person you reported to:

Are you aware of any actions that have been taken to respond to this incident yet?

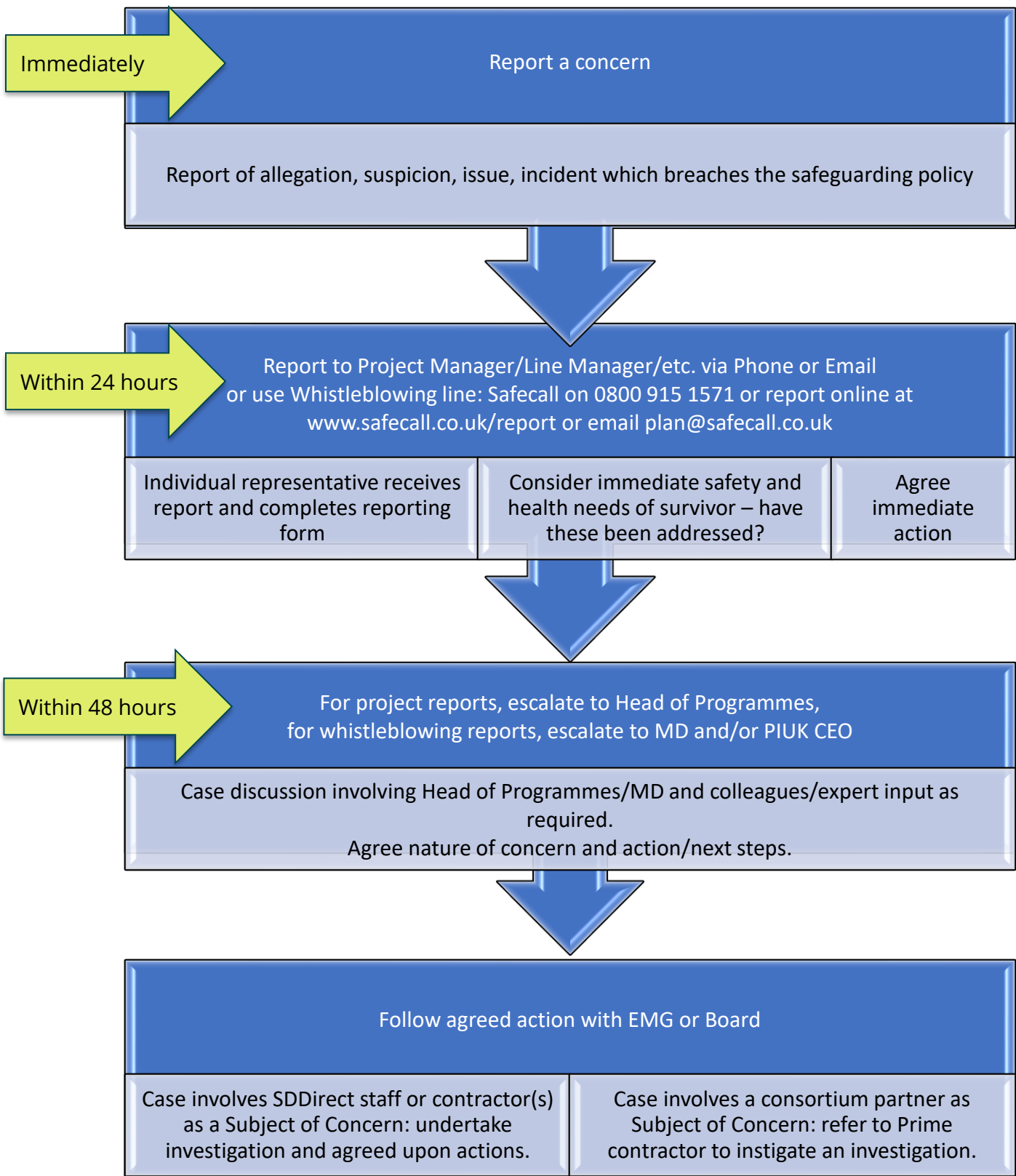
Do you have any recommendations for us as to actions to take (for example who to contact (in country) that can help the child/adult)?

Part Four: Other Information (Optional)

Please add any other relevant information below about yourself or the concern you are raising that has not been covered in the previous questions.

Annex 4: Reporting Flow Diagram

This diagram explains the process to be taken when SDDirect becomes aware of a concern, both on a project and for employees who want to report. If concern involves actual or possible criminal activity refer externally to national authorities.





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