

### Overview

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The approach to developing a safeguarding policy for your organization should be comprehensive. It should not be a generic policy but adapted to the work, the settings within which all those involved with your organization work, and the people they work with. For our initial purposes of informing our grantee partners, we have gathered some basic information together that could be relevant to organizations without a policy, those working on revising their policy, or those who may just be generally interested in learning more.

The information is adapted from excerpts from various sources, which are referenced in the footnotes. The sources are from international organizations, therefore it is necessary to adapt recommendations to the processes and expectations in the local context without compromising the integrity of the goal of prevention and a survivor-centered response based on the principles of “do no harm”.

### An organization can take these first steps when developing or reviewing a safeguarding policy

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**Ask:** If today a staff member reported abuse that occurred while conducting work activities, would we know how to respond, or do we have a plan in place to respond?

**Answer:** If the answer is no, then it is critical that your organization take the necessary steps to develop a victim/survivor-centered plan and policy with a *focus on prevention*.

If the answer is yes, please continue reading in the case you find there are elements you could strengthen in your current policy. <sup>1</sup>

**Consider this:** *“When you don’t know how to respond it leaves a lot of room for situations to be handled in ways which are traumatizing for the survivor. Furthermore, it can become easy for managers to dismiss cases or become hostile to survivors because their first reaction may be to panic without guidelines or structures. Often there are power dynamics at play in these situations, where the perpetrator is in a position of power and so they control the narrative. That way it becomes easier to get rid of a survivor than a perpetrator.”* - Megan Nobert

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<sup>1</sup> Moorehead, Susanna and Moreira da Silva, Jorge, (DevEx), *Opinion: A look inside the first international legal standards to prevent sexual abuse*, 2019. (<https://www.devex.com/news/opinion-a-look-inside-the-first-international-legal-standards-to-prevent-sexual-abuse-95459>)

The following information centers around these 3 essential components of safeguarding<sup>2 3</sup>

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- **Policymaking:** Putting in place work plans, codes of conduct, and ethical standards that provide explicit regulations to prevent and respond to sexual exploitation, abuse, and harassment. *Policies should be clear, understandable and written for the employee. They should not be complicated and legally convoluted, placing a comprehension barrier between the victim or survivor and their ability to use the policy.*
- **Prevention:** Training for staff, Board, volunteers, partners, consultants, and all others (in)directly involved in your work and purposeful information sharing with beneficiaries/target groups on their rights, reporting protocols, and response processes. Ensure your recruitment practices are preventing the hiring of perpetrators, for example, through robust vetting of candidates.

Organizations need to talk more and openly about sexual harassment and violence and in clear terms. Work to eliminate confusion about what is considered sexual and other forms of harassment and discrimination. Include cultural relativism in the discussion to work out different perceptions of what is okay and what is inappropriate to establish clear guidance on appropriate behavior in the workplace. For example, while one person may think it's okay to give a colleague a shoulder rub when they've done a good job, it might make someone else uncomfortable.

These conversations should help staff reflect on the impact of their behavior on others as an effort in prevention, i.e. reducing perpetration.

Create an open and safe space for these conversations to be had when needed by individuals and plan to have them as a mandatory and regular practice on a basis that is suitable for your organization.

- **Better systems to support victims and survivors:** This includes reporting and response protocols with clear guidelines; protection from retaliation for whistleblowers; integrated and safe response and protection for those who report abuses; and standards for assisting victims and survivors, including with financial support and healthcare. Ensure language and literacy levels are not barriers to access to this knowledge.

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<sup>2</sup> Ibid

<sup>3</sup> Edwards, Sophie, *Sexual violence against female aid workers: How organizations can tackle it*, 2017

(<https://www.devex.com/news/sexual-violence-against-female-aid-workers-how-organizations-can-tackle-it-89385>)

**Remember:** Developing a policy is the first, the next is putting the policy into practice and ensuring it is used as the guiding principle when cases arise. To reinforce the policy and to ensure the organizational focus is on prevention, the policy must be supported by action, non-passive and positive messaging that shifts the responsibility to perpetrators instead of focusing on self-protection methods like not going out at night, not wearing certain clothing, etc. Self-protection is still, unfortunately, necessary and important, however, victims and survivors should never be made to feel that it was their responsibility to not be exposed to harassment, discrimination and/or assault, but the perpetrators responsibility to not commit these acts in the first place. A culture of accountability is essential for prevention and response.

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### Other strategies and actions for strengthening your safeguarding policy and practice<sup>4 5</sup>

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**Keywords:** victim-/survivor-centered, safe, secure, supportive, right to privacy, accessible, responsive, preventative, gender-equality, non-discrimination, protection, accountability, transparency, clear and effective communication

- ✓ Foster improved **organizational culture and norms** through effective value-based leadership and guidance on goals, values, behaviors, and expectations related to sexual exploitation and abuse and sexual harassment, prevention and response, including the promotion of inclusive, non-discriminatory, gender-balanced work environments and opportunities, including by encouraging the recruitment of women in leadership and throughout organizations. Staff and volunteer induction with learning outcomes on the organizational values, ethics, and code of conduct and mandatory safeguarding training within the first few weeks of employment.
- ✓ Develop safeguarding policies and work plans on prevention and response that are effectively implemented; set goals and standards; demonstrate a coherent approach; are victim- and survivor-centered and based on the principles of “do no harm”. **Policies should clearly state that failure to respond appropriately to incidents will not be tolerated.**
- ✓ Develop Codes of Conduct or Ethical Standards that provide explicit standards and regulations to prevent and combat sexual exploitation and abuse and sexual harassment. Make them publicly available and share with target groups and partners. Ensure language and literacy levels are not barriers to access to this knowledge.

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<sup>4</sup> Oxfam, *Oxfam commits to improvements in aftermath of Haiti reports*, 2018

([https://oxfamapps.org/media/press\\_release/2018-02-oxfam-commits-to-improvements-in-aftermath-of-haiti-reports/](https://oxfamapps.org/media/press_release/2018-02-oxfam-commits-to-improvements-in-aftermath-of-haiti-reports/))

<sup>5</sup> OECD, Development Assistance Committee, *DAC Recommendation on Ending Sexual Exploitation, Abuse, and Harassment in Development Co-operation and Humanitarian Assistance: Key Pillars of Prevention and Response*, 2019

(<https://legalinstruments.oecd.org/en/instruments/OECD-LEGAL-5020>)

- ✓ Establish an independent, secure whistleblowing helpline as part of an effort to encourage anyone involved with your organization to come forward early with any concerns they may have. Ensure that all are informed about the helpline and how to use it. Develop reporting and response protocols with clear guidelines for all involved with the organization on when and to whom to report, and how to respond in a confidential, survivor- and victim-centered and ethically-sensitive manner. Staff should be aware of the obligation to report incidents within the set time frame for response and follow-up mechanisms. All should know that a policy for protection from retaliation is in place.
- ✓ Establish practice for senior leadership to commit to engaging and sustaining positive shifts in and efforts to improve organizational culture and norms in relation to prevention and response. Also ensure dedicated organizational capacity to support and coordinate work on sexual exploitation and abuse and sexual harassment, recognizing the links to broader human rights and commitments to gender equality.
- ✓ Review organizational practice for learning purposes and to ensure compliance. Immediately integrate important learnings in the policy. If it applies, ensure learning and response strengthening covers challenging circumstances and emergencies.
- ✓ Awareness-raising activities and educational, preventative outreach efforts with partners to ensure target groups and local populations are aware of their rights, reporting mechanisms, and available support services. Target groups, beneficiaries and local populations should be consulted in the design of the response processes and other relevant safeguarding measures.
- ✓ Ensure quality, victim- and survivor-centered **support and protection**. Establish a survivor- and victim-centered approach to prevention and response that places survivors and victims' experiences, rights, needs, and wants at the center of reporting, investigative, and response systems. This approach should take special consideration of vulnerable groups, including women and children, as well as people at risk of discrimination on the basis of, for example, disability, gender identity and sexual orientation, race, ethnicity, age or religion. A survivor- and victim-centered approach should be grounded in respect for human rights, as well as respect, confidentiality, safety, and non-discrimination.

This list is adapted from the source, *DAC Recommendation on Ending Sexual Exploitation, Abuse, and Harassment in Development Co-operation and Humanitarian Assistance: Key Pillars of Prevention and Response*. This is a great resource for a gender-sensitive approach to developing safeguarding policy and practice. It is extensively detailed but focused on the aid and development sectors. However, it is still a useful guide that can be adapted to your organizational context. Follow the link in footnote 5 for the full document.

### Resources

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Examples of safeguarding policies:

**Action Aid**

<https://sdg-ambassadors.com/wp-content/uploads/2019/02/ActionAids-SHEA-Policy-2019.pdf>

**Inter-Agency Standing Committee**

[https://interagencystandingcommittee.org/system/files/181101\\_iasc\\_champions\\_sea\\_sh\\_strategy\\_final.pdf](https://interagencystandingcommittee.org/system/files/181101_iasc_champions_sea_sh_strategy_final.pdf)

Other resources:

**BOND – Commitment to change in safeguarding**

<https://www.bond.org.uk/resources-support/safeguarding>

This is an excellent and highly recommended source of information and tool to use for developing and strengthening safeguarding policies.

“Sexual exploitation, abuse and harassment are fundamentally about gender inequality and power imbalance, and a profound effort will be needed if we are to ensure systemic and lasting cultural change. This change will be rooted in respecting and upholding the rights of the people we aim to serve, our partners, our staff, volunteers and trustees. In doing so, civil society organisations will ensure that they implement the highest standards on safeguarding, built around a survivor-centred approach and an organisational culture that aims to prevent abuse in the first place, but which responds quickly and thoroughly when it does happen. The additional risks associated with humanitarian interventions in conflict-afflicted, fragile states need particular recognition and distinctive approaches.”

OSLO December 17<sup>th</sup>, 2020