



# SG01\_Safeguarding and Protection from Sexual Exploitation Abuse (PSEA) Policy

## Purpose

The purpose of the policy is to protect people from any harm that may be caused due to their coming into contact with the International NGO Safety Organisation (hereinafter INSO). This includes harm arising from:

- The conduct of staff or personnel associated with INSO;
- The design and implementation of INSO's programmes and activities.

The policy lays out the commitments made by INSO and informs staff and associated personnel<sup>1</sup> of their responsibilities in relation to safeguarding and PSEA.

This policy has been drawn up on the basis of international good practice in safeguarding including the IASC Minimum Operating Standards for Protection from Sexual Exploitation and Abuse for UN and non-UN Staff.

## Scope of application

This policy applies equally to:

- The board of trustees.
- All staff contracted by INSO (under any contractual mechanism).
- Associated personnel whilst engaged with work or visits related to INSO, including but not limited to: auditors, trainers, consultants; volunteers; contractors; and programme visitors including but not limited to donors, auditors, journalists, staff relatives, researchers and politicians.
- It applies during or outside working hours, every day of the year.

---

<sup>1</sup> See 'Scope of application' for definition of associated personnel  
June 2021

This policy does not apply to cases of:

- Harassment or sexual misconduct between INSO staff or associated personnel. Such cases are addressed through our Bullying and Harassment Policy and the Disciplinary and Grievance and Whistleblowing policies.

## Review & approval

This policy will be reviewed, approved and endorsed by the INSO Board of Trustees annually, or when there are changes in applicable legislation and/or regulatory guidance.

This document will also be reviewed by the INSO executive management team after any safeguarding incident is reported and/or investigated.

## Policy statement

INSO believes that everyone we come into contact with, regardless of age, gender identity, disability, sexual orientation, religion or ethnic origin has the right to be protected from all forms of harm, abuse, neglect and exploitation. INSO has a zero tolerance approach to abuse and exploitation by staff or associated personnel.

INSO commits to addressing safeguarding and PSEA throughout its work, through the four pillars of;

**Awareness:** Ensure that all staff and associated personnel connected to INSO are aware of the high standards of behaviour and conduct expected of them to ensure that children and vulnerable adults are safeguarded and protected from sexual abuse and exploitation.

**Prevention:** Ensuring through awareness and good practice that staff who work with INSO minimise the risks of breaches of safeguarding and any form of sexual exploitation and abuse, including, but not limited to conducting relevant vetting and background checks of staff as part of their recruitment process.

**Reporting:** Ensuring that all INSO staff are aware on what steps to take when suspicions or concerns regarding safeguarding issues or allegations of sexual exploitation or abuse arise.

**Responding:** Ensuring that immediate action is taken to identify and address reports of breaches of safeguarding policy or sexual abuse and exploitation and ensure the safety and well-being of the person being abused or exploited.

## What is safeguarding and what does it mean for INSO?

In the NGO sector in general, we understand safeguarding to mean taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment, but also emotional abuse and neglect from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur.

In the context of INSO specifically however it is necessary to consider that, as an NGO-to-NGO service provider, we:

- do **not** work directly or indirectly with children or at-risk adults.
- do **not** work directly or indirectly with vulnerable beneficiaries of assistance.
- do **not** hold a position of power or superiority vis-à-vis our own beneficiaries.
- do **not** delegate or transfer any of our work to implementing partners.

As such, we understand our *specific safeguarding risks* in relation to vulnerable adults and children to include, but not be limited to:

- Sexual abuse or exploitation committed *by our own staff or associated personnel* of any third party.
- Reporting any disclosures of abuse or exploitation that we become aware of in the course of our work by third parties.

This document provides measures to protect against these specific risks along with more general risks common to the sector and matters of law.

Please see **Annex 1, 'Defining and Recognizing Abuse'** for a full explanation of what INSO means by abuse and some of the indicators that can be signs of abuse.

## Protection from Sexual Exploitation and Abuse (PSEA)

**a.** Sexual exploitation is 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 exploitation of another.

**b.** Sexual abuse means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

INSO staff and associated personnel must not:

- Sexually exploit or abuse any person.
- Engage in sexual activity with anyone under the age of 18 (regardless of local legislation or customs). Mistaken belief in the age of a child is no defence.
- Exchange money, employment, goods or services for sex or sexual favours. This includes, but is not limited to, using the services of sex workers, (whether or not prostitution is legal in the location) demanding sexual activity in exchange for assistance/service that is due to beneficiaries and demanding sexual activity in exchange for employment or administrative service.
- Any sexual relationship between those providing humanitarian assistance and protection and a person benefiting from such humanitarian assistance and protection that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of humanitarian aid work
- Use a child or adult to procure sex for others.

### Other responsibilities

INSO staff and associated personnel are obliged to:

- Contribute to creating and maintaining an environment that prevents sexual exploitation/abuse and safeguarding violations and promotes the implementation of this Safeguarding Policy.
- Report any suspicion or concern of safeguarding or PSEA issues. Any individual can raise a concern/complaint to INSO about an incident they have experienced, witnessed, or heard about

concerning an INSO staff member or partner (suppliers, partners, contractor, etc.) without fear of retribution.

Additionally, while not prohibited unless stated so by country level policy, the following types of sexual relationships are *strongly discouraged* as they generally involve unequal power dynamics and may be perceived as exploitative:

- Relationships between INSO's international and national staff members.
- Relationships between INSO's international staff and members of the local general public.

## Awareness

### INSO's Responsibilities

- INSO will: Ensure staff and associated personnel receive orientation on safeguarding and PSEA at a level commensurate with their role in the organisation.
- Ensure all staff and associated personnel have access to, are familiar with, and know their responsibilities within this policy.
- Guests travelling to INSO sites of operation will receive the policy for review and information.

## Prevention

### INSO's Responsibilities

INSO will:

- Implement appropriate safeguarding procedures when recruiting, managing and deploying staff and associated personnel
- Undertake its operations in a way that protects people from any risk of harm that may arise from their coming into contact with INSO.
- Appoint a Designated Person to ensure that safeguarding is given a high priority within INSO.
- Follow up on reports of safeguarding concerns promptly and according to due process.

### Communicating INSO's Safeguarding Policy and Procedures

This policy and associated procedures are publicly available on INSO's website and INSO will also communicate them to staff, associated personnel, beneficiaries, donors, other stakeholders and the general public as appropriate. This will include appropriate orientation for staff and associated personnel and public information in public access areas of INSO facilities.

### Relationships with NGO Beneficiaries

Without prejudice to the preceding and understanding that INSO's beneficiaries are the staff of other NGOs rather than vulnerable victims of conflict or crisis, relationships between INSO staff and other NGOs' staff, even where those staff are the registered beneficiaries of INSO, are **not prohibited**. However, staff must always apply due diligence in avoiding any impropriety or conflict of interest and must take into

consideration relevant factors such as conflicts of interest, cultural norms; security risks; applicable laws etc.

## Safeguarding in Recruitment

INSO is fully committed to safe recruitment selection and vetting of potential new staff, trustees and volunteers. We have adopted the following safe recruitment practices:

- a) Those responsible for recruitment and selection are properly oriented on INSO Safeguarding Policy and procedures;
- b) All vacancy announcements will affirm INSO's commitment to the Code of Conduct and Safeguarding Policy;
- c) Applicant screening will pay particular attention to gaps in employment history or frequent changes of employer and address;
- d) All offers of employment will be conditional on receiving at least two professional references which will be rigorously followed up on including questions on disciplinary actions. References from family members will not be accepted;
- e) All essential qualifications and relevant professional accreditations and memberships should be verified to the satisfaction of the relevant recruitment manager;
- f) The successful candidate will be required to provide proof of identity (passport, ID card);
- g) All new hires receive comprehensive orientation in the safeguarding policy and procedures and associated documents (Code of Conduct, Whistleblowing etc);
- h) All new hires are required to sign and abide by the Code of Conduct as a condition of employment.

While noting that INSO does not work directly or indirectly with children or at risk adults, if INSO does ever engage in activities that require staff, trustees, volunteers or other representatives to undertake a criminal record or other background check in accordance with relevant legislation, we will ensure that these are carried out as part of our commitment to safer recruitment and safeguarding.

No staff member, trustee, volunteer or other representative may undertake activities in relation to INSO that involve access to children or adults at risk without supervision unless and until an appropriate background check (which may include a criminal record check, as appropriate) has been completed with satisfactory results.

Where we become aware that any current or former staff member may pose a risk to children and/or at risk adults we will comply with the legislation and relevant guidance in respect of referring that person to the relevant authorities if appropriate.

Recruitment of trustees will be undertaken in accordance with good practice guidelines including that of regulators and donors and with reference to the guidance issued by the Charity Commission for England and Wales as a good practice reference point.<sup>2</sup>

---

<sup>2</sup> For example, see Charity Commission guidance CC30 *Finding new trustees*: <https://www.gov.uk/government/publications/finding-new-trustees-cc30>

## Reporting

INSO and related personnel have a responsibility to report any suspicion or concern of safeguarding issues. Any individual can raise a concern/complaint to INSO about an incident they have experienced, witnessed, or heard about concerning an INSO staff member or partner (suppliers, partners, contractor, etc.) without fear of retribution.

INSO employees and related personnel *must not* investigate allegations or suspicions themselves.

INSO recognises that we have a duty to create a working environment where staff are able to raise concerns and support each other to ensure the risk of a safeguarding incident occurring is minimised.

Therefore, INSO will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and those we come in to contact with.

To enable this, INSO has appointed the Director of Human Resources as the safeguarding Designated Person who is responsible for ensuring that safeguarding is given high priority within INSO. Specific responsibilities of this role include:

- Providing an organisation wide focal point for managing and reporting incidents and allegations;
- Providing support and advice to INSO managers and staff on all safeguarding matters;
- Carrying out referrals and reporting to the relevant authorities where sexual exploitation or abuse; abuse of a child; or abuse of an at risk adult is reported or suspected;
- Maintaining an overview of safeguarding issues and monitoring the implementation of the safeguarding policy and procedures throughout INSO;
- Continuous development of a robust and compliant safeguarding policy for INSO;
- Supporting the Executive Director in regular and time-sensitive reporting on all relevant safeguarding developments to the Board of Trustees.

Ensuring that INSO's safeguarding policy and procedures are integrated into the induction programme of all new INSO staff. The Designated Person can also offer additional responsive supervision and guidance to any member of staff who asks for it on an individual basis and provide further safeguarding training and support to senior managers to enable them to cascade safeguarding expertise and advice to their staff if needed.

As stated above, INSO trustees, staff and volunteers do not work directly with at risk adults or children as part of their mandate. However, should an instance occur where a INSO staff member finds themselves in direct contact with a child or an at risk adult through the course of their work, they shall immediately seek supervision and guidance from the Designated Person who may in turn seek expert professional advice where relevant for example from children's service, health service or police within the jurisdiction.

Any staff reporting concerns or complaints in good faith (or if they request it) will be protected by SG04\_Whistleblowing Policy.

INSO will also accept complaints from external sources such as members of the public, service users/beneficiaries, suppliers & vendors and official bodies.

### How to Report a Safeguarding or PSEA Concern

Safeguarding or PSEA concerns must be reported directly to INSO's Designated Person (INSO's Director of Human Resources, [francesca.mangia@hq.ngosafety.org](mailto:francesca.mangia@hq.ngosafety.org) or to the dedicated Protect hotline: [protect@ngosafety.org](mailto:protect@ngosafety.org).

The Protect hotline is monitored by the Designated Person, the Director of Internal Audit, the Executive Director and a designated Board Member.

## Response

INSO will follow up safeguarding reports and concerns according to policy and procedure, and legal and statutory obligations (see SG02\_Dealing with safeguarding reports)

Sexual exploitation and abuse by INSO employees and associates constitute acts of gross misconduct and are, therefore, grounds for termination of employment or contract/agreement. Breaches of safeguarding standards are grounds for disciplinary action up to and including dismissal. It is INSO policy to report all crimes to the relevant law enforcement authorities unless doing so may pose a risk to anyone involved in the case.

Within its means, INSO will offer support to survivors of harm caused by staff or associated personnel, regardless of whether a formal internal response is carried out (such as an internal investigation). This could include consultation with a qualified counsellor, medical assessment or assistance or personal protection such as relocation. Decisions regarding support will be led by the survivor.

## Confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management will be shared on a need to know basis only and will be kept secure at all times.

### Associated policies

*SG02\_Dealing with safeguarding reports*

*SG03\_Code of Conduct*

*SG04\_Whistleblowing Policy*

*Legal & Ethical Behaviour Standards (LEBS)*

*Bullying and Harassment Policy*