



1. Introduction

At Front Line Defenders we believe that all people, regardless of age, gender, disability or ethnic origin, race, family status, marital status, sexual orientation, religion have a right to be protected from all forms of harm, including abuse, exploitation and harassment.

Safeguarding concerns how Front Line Defenders protects persons (particularly children and adults at risk) from exploitation or abuse by Front Line Defenders' staff, individuals working on our behalf, and / or partner organisations, including as a result of how we design or implement programmes and activities. Safeguarding measures seek to prevent situations where individuals can use their position of power to abuse or exploit another person.

Insofar as Front Line Defenders operates alongside other actors in the course of our work, we accept that do not have direct authority or input into the running of other organisations. We therefore undertake to promote good safeguarding practice and share our policy with other organisations, as appropriate.

2. Policy Statement

Front Line Defenders does not tolerate abusive or exploitative acts (including sexual exploitation and abuse) perpetrated by Front Line Defenders staff (including those employed as contractors), fellows, interns, volunteers, Board members and representatives, or anyone associated with the delivery of our programmes.

All staff are bound to uphold this policy and have a mandatory duty to raise any concerns they have, including any concerns which are reported to them according to this policy. It is not a staff member's responsibility to decide whether or not an abuse has occurred.

Front Line Defenders upholds the principle of survivor support and will work with survivors to ensure that all options of support are explored.

It is the responsibility of all Front Line Defenders staff to ensure compliance with this policy. It is the responsibility of Front Line Defenders management teams to ensure the delivery of this policy, and to promote it as relevant in all aspects of Front Line Defenders work to hold themselves and others to account, and to help create a safe environment for all.

3. Scope

Front Line Defenders expectation is that those who represent the organisation (staff, fellows, contractors, volunteers, Board members and representatives, or anyone associated with the delivery of Front Line Defenders programmes) uphold these

safeguarding commitments in both their professional and their personal lives. All individuals are required to sign the declaration forms attached to this policy as part of their contract / agreement with Front Line Defenders and agree to abide by the behaviours and procedures outlined.

4. Purpose

The purpose of this policy is to set a clear standard for those included in the scope of the policy regarding their obligations when working with Front Line Defenders. These obligations include to treat people with respect and to actively prevent all forms of abuse, exploitation and harassment (including all forms of sexual misconduct and human trafficking). It also includes the obligation to report concerns immediately, via the designated feedback and complaint mechanism.

This policy also sets out the preventative measures taken by Front Line Defenders to minimise the risk of a representative abusing power and causing specific harm (for example exploitation or abuse) to any person engaging with Front Line Defenders or a member of the wider community, particularly those at heightened risk, such as children and vulnerable adults. It also sets out how Front Line Defenders identifies and responds to safeguarding concerns or allegations.

This policy does not cover abuse and exploitation occurring within the community by individuals and organisations not representing Front Line Defenders (for example forced marriages, other harmful traditional practices, or trafficking).

5. Definitions

A *child*: this policy recognises a child as being any individual under the age of 18 years. This recognition is irrespective of local country definitions, including legal definitions, of when a child reaches adulthood.

A *vulnerable adult*: this policy recognises that every adult (person aged 18 years or over) could be subject to harm or exploitation based on their age, gender, sexual orientation, health, social or economic status as well as relationships of dependency and/or hierarchy . Specific vulnerability is attributed to persons who are, or may be, in need of community care services by reason of mental or other disability, age or illness; and who are or may be unable to take care of themselves, or unable to protect themselves from the risk or experience of abuse or neglect.

Abuse: this policy defines abuse as any action or inaction that causes harm to another person. It can include physical abuse, emotional abuse, sexual abuse and neglect. It also includes abuse online and/or via mobile technology. (Please see Appendix 1 for additional and expanded definitions of abuse).

Exploitation: this policy defines exploitation as any actual or attempted abuse of a position of vulnerability, differential power or trust to profit monetarily, socially or politically. It includes sexual exploitation.

Sexual abuse: this policy defines sexual abuse as the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual Exploitation: this policy defines sexual exploitation as 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.

Survivor/victim: this policy defines the term survivor as the person who it is alleged has been the subject of abuse or exploitation. The term 'survivor' implies strength and resilience. The term 'Victim' can also be used to mean the victim of an alleged perpetrator's actions. This is not intended to negate the dignity and agency of an individual.

Safeguarding concern or allegation: this policy defines a safeguarding concern or allegation as a suspicion or allegation that a breach of this safeguarding policy has occurred or may be at risk of occurring. This includes disclosures by children and / or vulnerable adults.

Sexual harassment: this policy defines sexual harassment as any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment. While typically involving a pattern of behaviour, it can take the form of a single incident. Sexual harassment may occur between persons of the opposite sex or same sex. Any person can be either the victim or the offender.

6. Roles and Responsibilities

Senior Leadership:

- Responsible for the overall governance and oversight of safeguarding.
- Responsible for ensuring that appropriate policy and systems are in place.
- Responsible for ensuring that there are mechanisms in place to guarantee that all organisation representatives are aware of the safeguarding policy, and the responsibilities detailed within.
- Responsible for the management of all safeguarding cases.

Managers:

- Responsible for ensuring that all team members and those they engage to deliver the work of Front Line Defenders are aware of the safeguarding policy, and the responsibilities detailed within.
- Responsible for ensuring the systems put in place by Senior Management are activated to identify and mitigate against any potential safeguarding risks.
- Responsible for ensuring that good safeguarding practice is communicated to all staff, organisational representatives, programme participants and communities.

All staff & organisational representatives

- Responsible for modelling and promoting respectful behaviour and acting in accordance with the Code of Conduct.
- Responsible for fostering an environment that is open to hearing potential safeguarding concerns.
- Responsible for readily and promptly reporting any safeguarding concerns in accordance with this policy.

Board (Governance, Nominations, and Remuneration Committee):

- Responsible for review and sign off the policy.
- Responsible to receive and review a report annually from the Safeguarding Working Group.
- Responsible to investigate any complaints against the CEO and if required other senior staff.

7. Prevention

Front Line Defenders endeavours to create the safest possible environment for all people, particularly children and vulnerable adults, who come into contact with any representative of the organisation. Front Line Defenders does this by implementing the following practices:

7.1 Code of Behaviour

Front Line Defenders has clear expectations and requirements regarding the behaviour of all organisation representatives. All individuals representing the organisation are required to sign the Safeguarding Policy and the Code of Conduct Policy and adhere to the guidance within. All managers have a responsibility to ensure that all staff and those engaged to deliver the work of Front Line Defenders are aware of the Safeguarding Policy and the Code of Conduct policy, that they sign the compliance form and that these compliance forms are stored in a secure location with restricted access.

7.2 Safe Recruitment Practices

Front Line Defenders ensures that appropriate steps are taken during recruitment and selection of all staff and representatives (including Board and Volunteers), to make sure that issues relating to safeguarding are considered and addressed.

Safe Recruitment practices must be followed throughout the recruitment process and this involves incorporating safeguarding considerations within:

- Job advertisements
- Job descriptions
- Interviews
- Reference checks

- Contract clauses
- Self-Declaration Forms
- Qualifications and identification checks
- Safeguarding as part of inductions

Recruitment of Consultants and others engaged to deliver on behalf of Front Line Defenders

As part of the Front Line Defenders procurement process, the selection process for consultants includes the requirement for consultants to sign adherence to the safeguarding policy and the code of conduct. They are also required to sign a self-declaration form (see Annex 2 & 3).

7.3 Induction

Front Line Defenders will ensure that safeguarding awareness is included as part of the induction programme for all new staff.

7.4 Training

A minimum of one safeguarding training session will be conducted with all staff each calendar year. Attendance at a training session is mandatory. Additional sessions will be scheduled to ensure that all staff attend one session.

7.5 Risk Assessment / Safe Programming

Front Line Defenders is committed to promoting safe programming by actively including safeguarding risk management as an ongoing part of all our work by:

- Conducting thorough safeguarding risk assessments of all programmes and activities prior to commencement to identify risks and develop mitigation strategies to reduce and manage risks to all people, especially children and vulnerable adults.
- Aligning safeguarding risk assessment procedures to good safeguarding standards and to our policy commitments.
- Monitoring risks to ensure assessment-identified risks are reviewed, emerging risks are identified and documented and that mitigation strategies put in place are implemented, and reviewed for efficacy throughout the programme cycle.
- Ensuring that safe and accessible feedback and complaints mechanisms are in place so that any concerns can be reported and appropriate follow up actions can be activated.
- Promoting feedback and complaint mechanisms to ensure the mechanisms are known and accessible.
- Monitoring feedback and complaint mechanisms to ensure disclosures are received and managed in a timely manner.

- Encouraging contractors have mechanisms in place to actively prevent child abuse, trafficking, and sexual exploitation and abuse; Communicating Front Line Defenders safeguarding policy, Code of Conduct and reasonable expectations of representatives' behaviours to the individuals and the communities we work with, raising awareness and providing information on how entities can engage with the organisation.

7.6 Data Protection and Sharing Information

Front Line Defenders is committed to apply the highest levels of protection in processing of personal data. To support this commitment, the organisation has the following guidances in place:

- Restricted access and securities on all systems that hold personal data (including protection from malware)
- Guidance that safeguarding cases can only be accessed by a limited number of authorised staff, and on a case-by-case basis
- A commitment to ensure that all pictures of children and participants taken in relation to work are decent and respectful. An image / Images of an individual or a group or individuals that could in any way negatively impact upon their dignity or privacy are not acceptable.
- A requirement to obtain free, prior and informed consent from all interviewees and before creating any digital content (e.g. photographs and videos) of people including from parent or guardian of children
- A commitment to protect children's identity in all media involving those under 18 years old. (e.g. ensuring information, including combinations of information, which could be used to identify a child, is not published in images and/or interviews.) As per the Dóchas Code of Conduct on images and messages as adhered to by Front Line Defenders
- A burden to apply a safeguarding lens to all communications content and all fundraising activities, and prioritise the dignity and protection of community members who share stories for communication or advocacy purposes.

7.7 Concerns in the community (not involving Front Line Defenders Staff or Representatives)

Concerns in the broader human rights community are directed to and addressed through protection programming. Otherwise, staff should report as per procedures outlined in annex 5.

8. Receiving and responding to complaints and concerns

By creating safe environments, Front Line Defenders endeavours to reduce the potential for safeguarding cases to arise. However, in the event of a concern, it is important that the response is timely, appropriate, professional and manages possible further stress and / or impact. The organisation is committed to doing the following:

- To take all complaints and concerns seriously;
- To conduct an initial risk assessment and put in place measures to maintain safety of all those involved pending a further investigation; and
- To respect confidentiality in relation to all complaints and concerns.

Front Line Defenders will refer to the CHS Investigation Guidelines when responding to Safeguarding concerns. Each case will be considered individually and in accordance with national legal advice or other expert advice.

8.1 Mandatory duty to report safeguarding complaints and concerns

All Front Line Defenders representatives have a mandatory duty to report all concerns or allegations about breaches of Safeguarding policies. A poster will be displayed in workplaces to enhance learning and awareness detailing how and to whom complaints can be reported (see Annex 4). This is regardless of whether it is internal to Front Line Defenders or not. It is not the responsibility of staff to decide whether or not exploitation or abuse has occurred. All representatives must pass their concerns on via the appropriate channels. The need to report safeguarding concerns may arise when:

- A staff or representative witnesses or suspects abuse or exploitation, or grooming type behaviour;
- A staff or representative receives a concern, allegation, or complaint that indicates abuse or exploitation; or
- A survivor discloses abuse or exploitation.

Staff who fail to report a concern or allegation may be subject to disciplinary action. Although rare, deliberate false allegations are a serious disciplinary offence and will be investigated. Front Line Defenders will manage safeguarding reports (and other complaints) in a manner that prioritises the safety of the complainant and those affected at all stages.

Safeguarding concerns must be reported in accordance with the Safeguarding Policy. Where a safeguarding concern also constitutes a protected disclosure, protections under the Whistleblowing Policy apply.

8.2 How complaints and concerns are handled

Front Line Defenders manages safeguarding concerns and allegations in accordance with this policy and referral to CHS Investigations Guidelines, prioritising the safety of the person raising the concern/allegation and those affected at all stages.

Upon receipt of a safeguarding concern or allegation:

- Front Line Defenders will act, avoiding unnecessary delays and prioritising the safety of the survivor
- Front Line Defenders will hold a Safeguarding Committee meeting within 48 hours to assess the concern and consider if further investigation is

required (based on an indication that there may have been a breach of our code of behaviour)

- The Safeguarding Committee consists of the Deputy CEO, a Director from the ELT and the Human Resources Manager.
- The Committee quorum is two members.
- The Committee reports to the ELT as appropriate, and the Board (Governance, Nominations, and Remuneration Committee).
- In the event that the allegation relates to a member of the Executive Leadership Team or a board member, the complaint will be referred for review by an external specialist and another board member
- In the event of an investigation, the Safeguarding Committee will decide whether the investigating officer/team should be internal or external - decide next steps, including if anyone internal or external should be informed (on a “need to know” basis).
- Upon receipt of an allegation, the Safeguarding Committee will liaise with HR to discuss whether suspension(s) are required until an investigation is completed. Suspension does not imply guilt but protects all parties.
- The Safeguarding Committee will investigate the allegation in a manner appropriate to the content of the report.
- When appropriate, the Safeguarding Committee will keep the person who raised the concern/allegation updated of progress and resolution, unless:
 - the privacy of individuals would be affected
 - the survivor has expressly indicated a preference not to receive contact or for the person who disclosed to be updated
 - the report has been made anonymously and this is not possible.
- Front Line Defenders will observe the policy commitments on confidentiality (if children have been involved, parents or carers will be informed, as appropriate). Strong action will be taken against anyone who knowingly shares confidential information about a case.
- Staff must comply with safeguarding related investigations (internal and external) and make available any documentary or other information necessary for the completion of the investigation.
- Where safe to do so, and when in accordance with the wishes of the victims, survivors and whistleblowers, all alleged SEAH incidents that involve a criminal aspect should be reported through the correct local law enforcement channels regardless if it is mandated or not by law.

- All involved will be requested to sign non-disclosure agreements, including the members of the Safeguarding Committee.
- No person engaging in the procedures outlined here will be subject to unfavourable treatment for their role in the process, whether they are making a complaint in good faith, supporting a complainant, giving evidence in the proceedings, except where they are found to have a case to answer under the policy.

8.3 Onward Reporting

Front Line Defenders commits to report statistics and anonymised individual serious reports to the relevant regulatory bodies and donors, as required. As a general rule, names or personal details of alleged survivors, perpetrators, individuals who report a concern or allegation, or others involved will not be shared.

If it is necessary to disclose information to third parties this is decided on a case-by-case basis and, as far as possible, with the agreement of the individuals involved, except in cases of criminal activity.

9. Breaches and Non-Compliance

Failure to disclose a conflict or comply with this policy may result in disciplinary or governance action, including possible removal from office or contract termination.

ANNEX 1: ADDITIONAL DEFINITIONS

There are many definitions that exist in relation to safeguarding. Here are some of the some frequently used and also apply to this policy:

PSEAH / SEAH: Preventing Sexual Exploitation, Abuse and Harassment

Grooming: Grooming is when someone builds an emotional connection with a child or vulnerable adult to gain their trust for the purposes of sexual abuse, sexual exploitation or trafficking. Many children and vulnerable adults may not understand that they have been groomed or that what has happened to them is abuse.

Online grooming: The act of sending an electronic message to a child or vulnerable adult, with the intention of procuring the recipient to engage in or submit to sexual activity with another person, including but not necessarily the sender; or of sending an electronic message with indecent content to a recipient who the sender believes to be a child or vulnerable adult.

Physical abuse: The use of physical force against a child or vulnerable adult that results in harm to the child or vulnerable adult. Physically abusive behaviour includes shoving, hitting, slapping, shaking, throwing, punching, kicking, biting, burning, strangling and poisoning.

Neglect: The failure by a parent or caregiver to provide a child (where they are in a position to do so) with the conditions that are culturally accepted as being essential for their physical and emotional development and wellbeing.

Emotional abuse: Refers to a parent or caregiver's inappropriate verbal or symbolic acts toward a child, or a pattern of failure over time to provide a child with adequate non-physical nurture and emotional availability. Such acts have a high probability of damaging a child's self-esteem or social competence.

Trafficking in Persons: This is a form of exploitation and is defined as the recruitment, transportation or receipt of persons by means of deception, coercion, threat or force for the purpose of exploitation labour, sex trade or sexual exploitation,