

*Internal Document*

# **Practical Guideline for Implementing GN Child and Adult Safeguarding Policy**

**1<sup>st</sup> edition, January 2022**

**Good Neighbors Global Partnership Center**

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## Abbreviations

<b>GBV</b>	Gender-based Violence
<b>GN</b>	Good Neighbors
<b>GPC</b>	Global Partnership Center
<b>IASC</b>	Inter-Agency Standing Committee
<b>PSEA</b>	Protection from Sexual Exploitation and Abuse
<b>PTSD</b>	Post-traumatic Stress Disorder
<b>SEA</b>	Sexual Exploitation and Abuse
<b>SEAH</b>	Sexual Exploitation, Abuse and Harassment
<b>SFP</b>	Safeguarding Focal Point
<b>SGBV</b>	Sexual and Gender-based Violence
<b>SH</b>	Sexual Harassment
<b>ToR</b>	Terms of Reference

## I. Introduction

This guideline is designed to assist all Good Neighbors global offices and partnership countries to effectively set up and roll out their implementation procedures to meet their responsibilities for safeguarding children and vulnerable adults.

It aims to provide an overview of what all countries and offices need to do to implement the GN Child and Adult Safeguarding Policy and procedures along with a set of practical guidance related to topics and sections of the policy.

It will also serve as a reference for best practices and standards related to overall safeguarding matters for all global offices and partnership countries.

The objectives of the guideline are:

- i. Support the set up and operationalization of the GN Child and Adult Safeguarding Policy
- ii. Provide detailed guidance on the principles, mechanisms and procedures mentioned in the policy

## II. Publicizing the Policy: “Let the Policy Be Known by Everybody”

It is important to make the policy available to all GN employees, partners, community members and children that we work with. Such efforts to publicize and promote the policy could include:

- ensuring all your employees and partners know where a copy of the policy is available (e.g. GN knowledge center, website)
- presenting a poster of the GN safeguarding commitments in public places such as offices, meeting rooms, community centers and so on (*see Annex B*). For communities, child-, disability-, and literacy-friendly versions of a poster are strongly encouraged.
- enclosing a copy or containing provisions under the policy with all agreements and contracts and having them all signed
- translating the policy into local languages (if needed)

The Policy is based on universally accepted international standards of human rights and we have to avoid over-emphasizing local contexts, customary rules and arbitrary interpretations (e.g. even if age of consent can be perceived to be lower than 18 in a country or region, based on the UN Convention on the Rights of the Child ratified by ALL GN countries, the official age of adulthood and consent should be considered to be 18). Local legislation should be followed with guidance and advice from the

designated safeguarding focal point and HR department.

### III. Safeguarding: Everyone's Shared Responsibility

Safeguarding is everyone's shared responsibility. Everyone in (in)direct contact with children and vulnerable adults has a role to play in safeguarding.

All GN employees and partners must be aware of the policy, dos and don'ts (code of conduct) and guidelines and the problems with which children and vulnerable adults in community face. This means they fully understand their responsibilities of upholding given safeguarding principles and procedures including reporting any concerns about the abuse of power or exploitation against the program participants and people we work with.

In particular, key employees are designated as "focal points" with clear roles and responsibilities to meet the safeguarding standards and effectively roll out the policy throughout the organization at local, national and global levels.

#### 1. Safeguarding Focal Points (SFPs)

##### Appointing SFPs

In order to effectively roll out the GN Child and Adult Safeguarding Policy, all partnership countries and global offices are responsible for appointing a national safeguarding focal point. If necessary, they can also appoint a local safeguarding focal point at CDP level in order to fill the gap of safeguarding such as remoteness, large affected population, language barrier, cultural barriers, etc. They are the main and first point of contact for any safeguarding concerns raised at national and field levels and serve as focal points to communicate with the global safeguarding focal point and mainly to request or facilitate (in)direct support or guidance from GPC.

- **All partnership countries and global offices are required to appoint:**
  - One national safeguarding focal point (**mandatory**)
  - One or more local safeguarding focal points (**optional**): partnership countries only

Every partnership country and global office should appoint a national safeguarding focal point (at HO level for partnership countries), who is responsible for ensuring safeguarding measures are in place and integrated at national level. If the partnership country considers that they need focal persons at CDP or community level in order to receive a complaint or concern and respond to them more appropriately due to their geographical reasons and so on, they are encouraged to appoint one or more local

safeguarding focal points. Since the need to appoint a local safeguarding focal point completely depends on the country's context, *not* every partnership country should appoint one or more of them.

All contact information of national (and local) safeguarding focal points must be submitted to the Global Safeguarding Focal Point and publicized in an appropriate manner and known to everyone associated with GN's work including community members and partner organizations/individuals as well as GN employees.

### **Minimum Requirements for SFPs**

All GN global offices and partnership countries are highly recommended to designate a focal person with the following minimum requirements (where applicable):

- a. Minimum of three years of experiences with Good Neighbors (*unless a newly established office/country*)
- b. Completed the following GN Safeguarding Courses (*via GN Academy*)
  - i. GN Safeguarding 101 Course
  - ii. GN Safeguarding Policy Course
- c. Proven ability to work in a team and influence colleagues with a strong sense of responsibility and accountability
- d. Fully read the GN Code of Conduct and have strong sense approach to work ethics and behavior
- e. Must possess ability to communicate effectively verbally and in writing

### **Responsibilities of SFPs<sup>1</sup>**

#### **(1) Local Safeguarding Focal Point** (*\*optional, where necessary*)

- At the local community level (Including within the CDP or domestic project area), is the main and first point of contact for any safeguarding concerns raised by GN employees and community members
- Report all alleged violations to the National Safeguarding Focal Point
- Support designated personnel or team throughout the investigation process

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<sup>1</sup> See the policy, 'Section IX. Responding (2. Responsibilities of Safeguarding Focal Points)' (p. 16-18)

- Facilitate or conduct safeguarding training for local community level employees and provide guidance on how to identify violations and knowledge of reporting system
- Determine whether the reported concern or suspicion could be managed as a low level incident at local level or not. If s/he determines that it does not require escalation, conclude the case with the outcome at local level.
- Ensure all documents regarding investigation are properly preserved and provided to investigator(s) and national safeguarding focal point
- Provide appropriate support to survivors (e.g. psychosocial counseling, health care, legal support, referrals to other specialists, etc.)
- Ensure that community feedback mechanisms are in place, providing children and community members with information on what, how and whom to report any misconduct by GN employees and partners.
- Provide consultation on how to design and implement safe programming to minimize the potential or unintended harm to children and vulnerable adults

(2) **National Safeguarding Focal Point** (*\*if the Local Safeguarding Focal Point is not appointed due to the country context, the National Safeguarding Focal Point is responsible for all the above-mentioned duties as well*)

- Report all alleged violations to the Global Safeguarding Focal Point (GPC) and Regional Coordinator
- Carry out initial assessment and information gathering of the incident in consultation with local safeguarding focal point
- Determine whether the reported concern or suspicion could be managed as a low level incident at national level or not. If s/he determines that it does not require escalation for the safeguarding committee review, the case will be concluded locally.
- Where investigations should be followed, they will coordinate investigations and conduct interviews with all of the involved personnel in consultation with internal investigator(s) and local safeguarding focal point and/or cooperate with external investigation specialists where appropriate

- Make recommendations in consultation with safeguarding committee, country representative and the relevant Regional Coordinator for further corrective and/or remedial measures to be taken (*if the case is not escalated to the global level*)
- Inform appropriate local authorities such as the police where possible, unless a report is likely to cause any harm to a survivor
- Build a roster of external experts in order to support survivors and provide appropriate referral services and secure detailed information on local safeguarding infrastructure, and locally available safeguarding resources.
- Ensure that all records are documented in an appropriate manner and remain confidential to the extent possible
- Facilitate or conduct safeguarding trainings for national level employees and provide guidance on how to identify violations and knowledge of reporting system
- Ensure that all employees at local and national levels are regularly trained and fully aware of their responsibilities of reporting and responding in accordance with this policy

### **(3) Global Safeguarding Focal Point**

- Receive and manage all safeguarding reports from every partnership country and global office via diverse reporting channels.
- Assure the quality and continuous improvement of the Policy and procedures
- Provide advice, guidance and appropriate resources in relation to investigation, employee training and overall implementation of the Policy when requested by any GN partnership countries or global offices
- When the case is escalated to the global level for the final decision to be made, convene a safeguarding committee, which review the investigation results and recommendations and determine disciplinary action for perpetrator
- Conduct and/or facilitate training on safeguarding and ensure that all GN employees and national/local safeguarding focal points are trained and fully aware of prevention, reporting, and responding procedures

- Ensure that all reports are managed, documented and preserved properly and remain confidential to the extent possible
- Ensure that the GN Global Safeguarding Report is published annually based on the safeguarding annual reports submitted by all GN partnership countries and global offices
- Report the outcome (e.g. # of cases reported/closed, an outcome acted upon, etc.) to ISC and GPC Board on a regular basis

## 2. Specific Manager Responsibilities

Responsibility	Action
<b>All GN Employees and Partners</b>	Any individual who is working or contributing to the work of Good Neighbors including employees and partners fully understand their safeguarding obligations and must report any incidences or suspicions of abuse or exploitation. The same obligation is attributed to staff and personnel who are members of GN’s partner organizations. Those who fail or neglect their safeguarding responsibilities can be subject to disciplinary measures or termination of partnership with GN. Management should be proactive and responsible in dealing with safeguarding issues.
<b>Global Partnership Center (GPC) Board Members (Global Senior Management)</b>	They bear the overall responsibility and accountability for the global implementation of this policy
<b>Board of Directors and Steering Committee Members</b>	They have the shared responsibility to ensure that this policy is integrated to the direction and operation of the organization and that the representatives correctly fulfill their obligation
<b>Secretary Generals and Representatives</b>	They serve as ex-officio focal points for ensuring awareness building, implementation and processing of this safeguarding policy and creating a safe working environment. They have the responsibility to fully support the work of national and local safeguarding focal points regarding all the necessary safeguarding procedures and play a leading role in the global or national safeguarding committee respectively. They also ensure that appropriate training and information dissemination related to this

	policy is made to employees, community members and all relevant stakeholders.
<b>National and Local Safeguarding Focal Points</b> <i>(refer to 'VIII. Reporting' and 'IX. Responding' in the policy for more specific responsibilities of national and local safeguarding focal points)</i>	They are the first point of contact for safeguarding concerns who is primarily responsible for the direct implementation of this policy including receiving the report, investigating incidences, supporting survivors and making recommendations for the safeguarding committee to review as well as facilitating trainings. It is highly recommended to build a roster of external experts that could support cases of abuse or exploitation especially in order to support survivors and provide them referral services.
<b>Global Safeguarding Focal Point</b>	GPC should designate a Global Safeguarding Focal Point for this policy. The mandate of the Global Safeguarding Focal Point should be a full time senior managerial position at GPC with key decision making power who is given a direct access to Secretary General in case emergency responses are needed or safeguarding issues are not addressed appropriately. The Global Safeguarding Focal Point receives all reports concerning safeguarding violations from GN partnership countries and global offices and supervises the compliance and implementation of the current policy at the global and national levels in collaboration with the Regional Coordinator.
<b>Regional Coordinators</b>	Regional Coordinators are responsible for receiving reports from field countries and overseeing the implementation of this policy in their region.

### 3. National and Global Safeguarding Committees

National and Global Safeguarding Focal Point are supported by a Safeguarding Committee that collectively reviews the investigation results and recommendations and determines corrective or remedial actions vis-a-vis the survivor and the perpetrator.

The national safeguarding focal point convenes a safeguarding committee with an approval and engagement of the representative of the country or global office. The committee reviews the investigation results and recommendations and determines corrective or remedial actions for perpetrator depending on its gravity in consultation

with the relevant regional coordinator (if a field country). When the severity of the incident is deemed to be serious and needs advice from global senior management, the National Safeguarding Focal Point and/or the Committee should immediately report to the Global SFP.

The national safeguarding committee may include:

- Representative of the country or global office (or equivalent)
- National safeguarding focal point
- Regional coordinator
- One or more safeguarding expert (child protection, PTSD, SGBV etc.)
- HR director or manager (in country)
- Other relevant senior managers

The Global Safeguarding Focal Point revises the seriousness of the incidence reported to the global level and decides if to convene a safeguarding committee with the approval and engagement of the GPC Secretary General. The committee reviews the investigation results and recommendations as well as the measures taken by the partner country and determines if additional measures are required on the global level.

The global safeguarding committee may include:

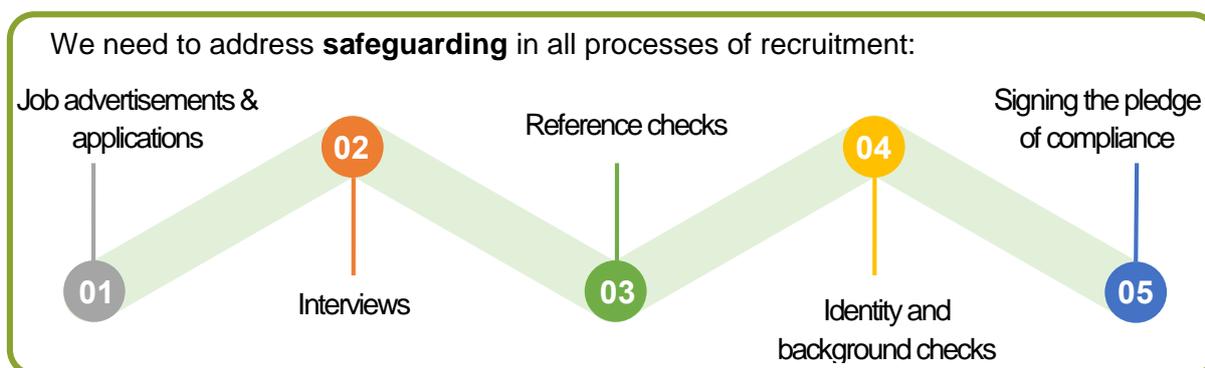
- GPC Secretary General
- Global safeguarding focal point
- One or more safeguarding expert (child protection, PTSD, SGBV etc.)
- HR director or manager (GPC)
- Other relevant senior managers

#### IV. Safe Recruitment Procedures

Human Resources (HR) manager/team of the partnership country or global office will be responsible for the following in regards to the policy:

- Keep the record of all the pledge of compliance with policy<sup>2</sup> signed off by GN employees and partners
- Address safeguarding in all processes of recruitment
- Keep the record of GN employees and partners who have attended GN Safeguarding Courses and other related training sessions
- Understand the local law and contexts in regards to recruitment such as availability of background record checks by the police and adapt the policy and practices appropriately in accordance with local stakeholders
- Record on data base of details of background record checks issued by the police and relevant local/national authorities

To ensure safe recruitment, all GN global offices and partnership countries will address safeguarding in job advertisements, applications, interviews, obtaining references and identity and background checks accordingly.



Check the following recommendations/steps<sup>3</sup> to follow for every recruitment stage and adapt depending on the role or your country/office context.

##### 1. Job advertisements and applications

- The office or country (HR team) should outline GN’s commitment to

<sup>2</sup> See Annex 2 of the policy.

<sup>3</sup> The following checklists are mostly taken from Lebanon PSEA Network’s Safer Recruitment ‘Check List’ and Guidance for Preventing Sexual Misconduct (Version 2020); Partially taken from the Keeping Children Safe’s *Child Safeguarding Standards and how to implement them* (Checklist for recruitment and selection). p.20

safeguarding in recruitment advertisements, job descriptions and applications so that all candidates are aware of their roles and responsibilities to meet the requirements of the GN's safeguarding policy.

Below is the sample safeguarding clause you can use for the job advertisements and/or applications.

### **[Annex 1] Sample safeguarding/PSEA clause for job advertisements**

Good Neighbors (*country name*) has a zero tolerance to any harm or sexual exploitation and abuse against any beneficiaries (or program participants). Safeguarding and Protection from Sexual Exploitation and Abuse (PSEA) is everyone's shared responsibility and all GN employees and partners are required to adhere to GN's Code of Conduct both during and outside working hours. Familiarization with and adherence to the GN Safeguarding Policy and Code of Conduct is an essential requirement of all employees and partners, in addition to related mandatory training. All employees and partners must ensure that they understand and act in accordance with this clause.

- Link the job advertisements to the Good Neighbors' Safeguarding online page and other relevant policies online (e.g. global or national website).
- Make sure that HR personnel and any other relevant staff involved in the recruitment process and interviews are fully briefed on GN safeguarding policy and GN Code of Conduct.
- Include a requirement for applicants to self-disclose prior sexual or other misconduct and termination of past employment, as well as to consent to the disclosure of any misconduct and termination by their former employers as part of the recruitment process.
- Develop clear job descriptions and ToR for all posts. In particular, analyze the role and think about the issues of safeguarding and risk in that job. Assessment questions to identify SEA and other safeguarding risk levels related to the role are provided as below:
  - What contact with children and vulnerable adults will the job involve?
  - What other sort of contact may the candidate have with children/adult such as email, phone, letter, internet?
  - What level of supervision will the candidate receive? Unsupervised? Does it involve working in isolation?
  - Are there any safeguards which can be put in place to minimize any potential risks?

Below is also the sample assessment tool for safeguarding risk level for jobs. You may use this sample in your country/office or adapt depending on your situation and context.

This form is to be assessed and completed by your HR personnel or any other hiring manager at job description development stage.

**[Annex 2] Sample tool for assessing the safeguarding risk level for jobs<sup>4</sup>**

Job title of vacancy: \_\_\_\_\_  
 Assessed by: \_\_\_\_\_ Date: \_\_\_\_\_

(\*) Requires criminal background check and 'high' level of safeguarding interview questions  
 (\*\*) No criminal background check required and low/medium level of safeguarding interview questions

<b>Job involves:</b>	<b>Yes</b>	<b>No</b>
Regular direct contact with beneficiaries	(*)	
Senior management (country director, regional coordinator, general manager, OD/AD/SSD manager or any other senior person)	(*)	
Back office work with rare direct contact with children and/or vulnerable adults (not a regular <sup>5</sup> occurrence in the role)	(**)	
Providing or delivering services to children or vulnerable adults creating regular or unsupervised direct or indirect contact, such as work in; <ul style="list-style-type: none"> <li>• Sponsorship management</li> <li>• Health</li> <li>• Education</li> <li>• WASH</li> <li>• Income generation</li> <li>• Psychosocial support services</li> <li>• Refugee camps</li> <li>• Distribution</li> <li>• Research</li> <li>• Home visits</li> </ul>	(*)	
Role to distribute goods and resources directly to beneficiaries (program participants)	(*)	
International posting	(*)	

- If former proven misconduct is found during the process, depending on the

<sup>4</sup> Developed by Concern Worldwide and adjusted into GN's context.

<sup>5</sup> Regular should be defined as i) once a week or more, ii) four or more days in a 30 day period, iii) overnight

type of misconduct, consider rejecting the candidate, unless there are mitigating circumstances.

## 2. Interviews

- All interviews should include questions about previous work with children and vulnerable adults and the candidate's understanding of safeguarding and GN's commitment.
- Include specific questions that draw out candidates' attitudes and values in regards to protecting children and safeguarding adults.

Below are sample interview questions. Not all these questions need to be asked during the interview. The below questions can be adjusted and adapted depending on the position (managerial level; field or national level; direct contact with children and community members, etc.). For entry level positions, more clear and simple questions can be asked. Inform the candidates that their answers to the following questions will not be evaluated for the role particularly, but it is to have better understanding on their knowledge of sexual misconduct and any other safeguarding matters prior to their job induction.

### [Annex 3] Sample interview questions on safeguarding and PSEA<sup>6</sup>

#### Priority questions

- Have you ever been investigated for a breach of your organization's Code of Conduct, safeguarding or PSEA policy? (this question can also be asked as part of the application process)
- The organization's Code of Conduct applies to all staff, both on and off duty. Do you have any issues with that and with signing the CoC?
- All staff are required to complete training on safeguarding/PSEA in the work place. Are you willing to take part in and complete such trainings?
- Tell us about a time when you witnessed a case of abuse or power in the workplace. What action, if any, did you take? What did you learn?
- For managerial roles: What measures would you take to promote a safe environment for your team/organization which takes zero-tolerance towards any harm and prevents sexual exploitation and abuse?

#### Additional questions

- Have you ever felt uncomfortable about a colleague's behavior towards children or vulnerable adults in a previous job? What were your concerns, what did you do, and how was the issue resolved?

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<sup>6</sup> These example questions are taken from *Safer Recruitment 'Check List' and Guidance for Preventing Sexual Misconduct (Lebanon PSEA Network, Version July 2020)* and *National College of School Leadership Safer Recruitment Workshop* (<https://rds.eppingforestdc.gov.uk/documents/s56231/SPS-007>).

- What are your attitudes to child protection/safeguarding adults? How have these developed over time?
- What are your feelings about children or adults who make allegations against staff?
- Can you give me some examples of how you would contribute to making the organization a safer environment for children/vulnerable adults?
- Tell me about a time when you have been working with children/vulnerable adults and your authority was seriously challenged. How did you react and how did you manage the situation?

### **Sexual exploitation and abuse scenario<sup>7</sup> (optional)**

One of your team members, tells you in confidence that another team member behaved in an inappropriate way, sending pornographic images, with some female beneficiaries. Your team member feels very uncomfortable but asks you not to say anything, as they are concerned that it would damage the work relationship if their colleague discovers that they have reported on him/her. What would you do? (subsequent question) Who else should be informed?

### **3. Reference checks**

- Inform all candidates in advance that references will be verified and that they will be vetted for any former misconduct such as prior criminal records according to related national laws or other privacy/data protection regulations.
- References should be obtained from *at least two persons* including former/current HR department of the potential candidate or others who have knowledge of the candidate's experience and suitability to work with children and vulnerable adults. You can use the below sample reference check to assist you with compiling your questions.
- Steps to follow for reference check:
  - a. Obtain referee details from the applicant and/or contact anyone who is able to provide details about the person's experience and suitability for the job;
  - b. Decide what you want to ask the referees (see the below sample);
  - c. Contact the referees
- In some of cases where written references are not available or referees may feel more comfortable speaking instead of writing about them on paper, consider also conducting oral/verbal reference checks to complement written references.

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<sup>7</sup> Excerpted from *Safer Recruitment 'Check List' and Guidance for Preventing Sexual Misconduct (Lebanon PSEA Network, Version July 2020)*

- Documentation of references should be kept in file by current HR department.

**[Annex 4] Sample reference check questions<sup>8</sup>**

<b>Reference Check</b>	
Applicant: _____ Date: _____	
Position applied for: _____	
Referee's details: _____	
Reference check conducted by: _____	
<b>Reference check questions</b>	
How do you know the candidate?	
For how long have you known the candidate?	
What duties and responsibilities does/did the candidate have?	
Do you have any suspicions that the candidate violated your organization's Code of Conduct, including sexual misconduct in the workplace?	
Would you consider the candidate suitable to work with children and/or vulnerable adults?	
Hypothetically, would you like to employ or work with the candidate again? Why or why not?	
Do you have any final comments?	

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<sup>8</sup> Some of questions are taken from the *Safer Recruitment 'Check List' and Guidance for Preventing Sexual Misconduct (Annex D)*

Thank you for taking the time to provide feedback. If you wish to provide any further information, you can contact at           (your contact details)          .

#### 4. Identity and background checks

- Ensure full reference checks with prior/current employers (and/or others who have knowledge of the candidate’s experience and suitability) and background record check (BRC) including national criminal records *for the roles/posts working directly with children and vulnerable adults including persons with disabilities, GBV survivors, minority groups, etc. or accessing to children’s information*, if considered appropriate for the local context and permitted by national law.
- For international recruitments, criminal records may be difficult to access at the international level for some cases. An up-to-date criminal record can be requested from the candidates last country of residence and/or home country.
- For national criminal records, conducting a criminal or background record check may be highly costly or difficult to access at police stations in some countries.
- All employees and partners involved with GN’s work including short-term contracts, consultants, interns should sign and submit *the background check verification form*<sup>9</sup>.

#### [Annex 5] Background Check Verification Form

**Background Check Verification Form**  
(See Annex 3. in the policy document)

1. **Personal Information**

- Full name:
- Position/title:
- Country office:
- Contact:
- Address:

2. **Background Check Verification**

<sup>9</sup> See Annex 3. Background Check Verification Form (p.28) in the policy.

1. I have no history of a criminal record associated with risk to children or vulnerable adults.

Yes  / No

2. *(Applied to only staff who come into direct contact with children and vulnerable adults)*

I have submitted the BRC record issued by the police/local authority.

Yes  / No

Reviewed by:	Approved by:
Date:	Date:
Signature:	Signature:

- Must ensure that persons with a record of any crime against children or sexual exploitation and abuse against adults must not be hired or engaged by GN
- All the documents must be reviewed and kept on file by HR manager (or equivalent) and verified by the representatives of global office or partnership country. (see the BRC verification sample below that you may use or adapt by your own context)

**[Annex 6] Verification of Completed Background Record Check (BRC)<sup>10</sup>**

**Verification of Completed Background Record Check (BRC)**

Employer: \_\_\_\_\_ Date: \_\_\_\_\_

Employee's name: \_\_\_\_\_

Please check the following that apply:

- A comprehensive BRC for criminal or sexual offense history has been conducted
- No history of a criminal or sexual nature was found

<sup>10</sup> This BRC verification form is partially taken from the Save the Children's Policy on Child Safeguarding (Annex VII)

No known concerns indicating that the candidate would pose any risk or harm to children or vulnerable adults

Approved by: \_\_\_\_\_  
(HR manager or representative)

Date: \_\_\_\_\_

### 5. Signing the pledge of compliance with GN safeguarding policy

- All newly hired employees should sign the pledge of compliance to GN safeguarding policy<sup>11</sup> (see below) and submit it to HR department/team (or equivalent). It is recommended that they sign and submit the pledge of compliance before being offered a contract. Make sure to explain the GN Safeguarding Policy and Code of Conduct (CoC) fully to all newly hired employees, short-term contracts, volunteers, interns, other personnel, etc.
- If a pledge of compliance was not signed at the time of onboarding in particular instances, HR department/team (or equivalent) should follow up to ensure this is signed by all employees or other personnel within your office.
- Include a safeguarding/PSEA clause (see Annex 1) in employment contracts and all agreements with partners. The contracts and agreements should outline disciplinary measures to any safeguarding or PSEA related allegations such as termination of contract or partnership or any other legal measures if applicable.

### [Annex 7] Pledge of Compliance

#### **PLEDGE OF COMPLIANCE WITH GN SAFEGUARDING POLICY**

*(See Annex 2. in the policy document)*

I acknowledge that I have read and understood the Good Neighbors Safeguarding Policy. I agree to comply with the policy and pledge sincerely to comply with the policy. I understand that following the policy is required during my employment and failure to comply will result in disciplinary actions.

This Acknowledgement form shall have effect throughout a period of employment or engagement with Good Neighbors from the date on which it has been signed as indicated below.

<sup>11</sup> See Annex 2. *Pledge of Compliance* (p.27) in the policy.

Date:  
Name:  
Signature:

## V. Safeguarding Training

- Include safeguarding training/courses as part of all mandatory onboarding processes and provide refresher trainings/courses at least once every two years.
- Provide online safeguarding training courses *via GN Academy* (Link to the GN Academy: <http://academy.goodneighbors.org/>).



GN Academy, <GN Safeguarding Course I & II>

- Where access to online training courses is not available or language barrier is in place, training should be provided and completed in person.
- Visitors orientation to safeguarding:
  - Provide all visitors (members, donors, invited guests, journalists, researchers, celebrities, etc.) with a brief orientation training on the GN safeguarding policy. You may use the site verbal orientation script sample provided below.

### [Annex 8] Site verbal orientation script

**Site Verbal Orientation Script**  
(See Annex 4. in the policy document)

This is a sample script to conduct a verbal orientation to visitors. All visitors coming to GN project sites must receive orientation on GN Safeguarding policy and sign the policy acknowledgement form. The team leader or lead organizer of the visit (from the host side), is responsible to ensure that the orientation has been provided and the acknowledgement form is completed.

#### **1. Introduction:**

- Good Neighbors exists to make the world a place without hunger, where people live together in harmony.
- Good Neighbors respects the human rights of our neighbors suffering from poverty, disasters, oppression, and helps them to achieve self-reliance and enable them to rebuild their hope.
- Good Neighbors has zero-tolerance on child and adult abuse, exploitation and any other safeguarding issues.
- To ensure that Good Neighbors protect people from any risk or harm during our programs, especially children (any person under the age of 18), women and vulnerable adults, we have GN Safeguarding policy. All visitors should abide by the policy during the visits.

#### **2. Here are some of the key important things you should know:**

- Please treat all children equally and fairly.
- Please respect the best interests of children and be careful about language, behavior and interactions with children and vulnerable adults.
- Please do not exchange contacts with children.
- Please do not give or exchange money to children.
- Please do not take photographs or videos without the consent from the children or adults. Taking photographs and videos are only allowed with GN's approval and the consent from the persons.
- Please do not help children with personal activities if they can do so autonomously, and only within the boundaries of professional activities and with consent from a parent or guardian (e.g., toileting, dressing, feeding, washing, etc.);
- Please report immediately to GN employee when there is an alleged safeguarding incident.
- Visits to our sites and contacts with children are only allowed in attendance of GN employees.
- Please note that we will intervene in case there are any safeguarding concerns during the visit.

- After receiving the orientation, they should sign and submit the acknowledgement form<sup>12</sup> (see below) prior to their direct engagement with children or vulnerable adults or field visits. The signed acknowledgement forms are kept by the field country.

### [Annex 9] Acknowledgement Form

#### **GN SAFEGUARDING POLICY ACKNOWLEDGEMENT FORM**

I acknowledge that I have been provided and have reviewed the Good Neighbors Safeguarding Policy. I consent to comply with the policy during my visits to Good Neighbors sites and participation in Good Neighbors activities.

This Form of Acknowledgement shall have effect for a period of two (2) years from the date on which it was signed as indicated below.

Date:

Name:

Signature:

### **VI. Working with Partner Organizations**

All GN partnership countries and global offices ensure that your partner organizations comply with international safeguarding principles. It is also strongly recommended that a GN partnership country supports and helps to build the capacity of their partner organizations in implementing the safeguarding policy, where needed. Your partner organization may be one of the below. They may or may not receive funding from GN.

- Nonprofit or Nongovernmental organization
- Community-based organization
- For-profit enterprise
- Government (Local or national)
- Contractors such as consultant, vendor, supplier, etc.
- Or any other entity implementing a program or activity on GN's behalf or in

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<sup>12</sup> See *Annex 5. Acknowledgement Form* in the policy.

collaboration with GN

**(1) What you should do:**

- Include application of and compliance to the GN safeguarding policy in all agreements
- Make sure that all agreements indicate the partner organization's commitment to safeguarding.
- Have a due diligence process or carry out risk assessment before partnering with any party. If a partner's capacity for safeguarding low or does not have their own safeguarding policy, hold an induction training session on safeguarding for them and provide them any other resources or support where needed.
- If the partner organization has their own safeguarding policy, ask them to submit, review and determine if is appropriate and in line with the GN policy and international standards.
- If the partner organization agrees to comply with the GN safeguarding policy, they should sign the acknowledgement form (*see Annex 9*) and submit it to us. It should be attached in all agreements.

**3. Qualifications and Requirements**

- 1) All supplying partners responding to this tender are considered to agree to participate in the Good Neighbors movements (Mission and Core Values) with good faith.
- 2) All supplying partners responding to this tender should comply with environmental principles to promote greater environmental responsibility and to maximize resources efficiency and minimize risk. They shall carry out periodic checks on chemicals being used and maintenance of records and minimize use of hazardous substances during the sourcing process.
- 3) All supplying partners responding to this tender should comply with Good Neighbors Child and Adult Safeguarding policy. Additionally, the partners who selected in the tender should sign and submit the GN Safeguarding Policy acknowledgement form along with the agreement. The main contents are as follows.
  - All supplying partners who participate in this procurement program shall comply with the Convention on the Rights of the Child which requires that a child shall be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral or social development (Article 32)
  - All supplying partners who participate in this procurement program shall take all appropriate measures to prevent sexual harassment and sexual exploitation and abuse of anyone by its employees, related personnel and controlled by the supplier to perform any services under the agreement. Sexual activity with any person under the age of 18 is prohibited regardless of any laws relating to consent. Exchange of money, employment, goods, or services for sex is prohibited. Any of these practices shall be grounds for termination of agreement.

**[Example A] Safeguarding obligations included in Request For Quotation for 2022 GN Global Procurement Program**

- PARTY B shall comply with Good Neighbors Child and Adult Safeguarding policy. Additionally, PARTY B shall sign and submit the GN Safeguarding Policy acknowledgment form along with the agreement as is the attached form.
- PARTY B shall maintain the goods' quality as the sample confirmed by PARTY A.
- PARTY B shall comply with goods' delivery due date as requested schedule by Party A. If it is deemed impossible to deliver the goods according to the planned schedule, PARTY B shall immediately notify PARTY A in writing so that PARTY A can be aware of the change.

### **[Example B] Safeguarding requirements included in 2022 Good Neighbors Global Procurement Contract**

#### **(2) What the partner organization should do (during the agreement period):**

- Report any alleged or known violations of the policy to GN including SEA cases or any other allegations raised within the GN project site; or allegedly committed by either GN staff or partner organization's staff or other associated personnel including their sub-contractors during the agreement period
- Undertake a safe recruitment process including having all their personnel working or involved in the GN project clear comprehensive background record checks (BRC)
- Conduct a risk assessment to ensure safe programming
- Provide safeguarding training to all their staff and other personnel associated with the GN project

If the partner does not have capacity for implementing safeguarding, GN must support them throughout the process.

## **VII. Reporting**

Please note that the reason why we have set multiple channels for reporting is to fully help anyone who has witnessed, suspected, alleged or known violations of the policy to easily report to any one of those channels as soon as possible.

For example, if you are a volunteer in one of the CDPs and you feel more comfortable of reporting via hotline anonymously not directly to your local or national safeguarding focal point, you can fill out the reporting form<sup>13</sup> (see below) and directly send it to [safeguarding@goodneighbors.org](mailto:safeguarding@goodneighbors.org).

Report the concerns or allegations to one of the below channels immediately or within

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<sup>13</sup> See Annex 6. *Safeguarding Incident Reporting Form* in the policy.

24 hours.

- Direct supervisor (if an GN employee)
- Local Safeguarding Focal Point (at CDP level)
- National Safeguarding Focal Point (at HO level)
- Safeguarding hotline anonymously or in name at [safeguarding@goodneighbors.org](mailto:safeguarding@goodneighbors.org) (if the above options are unavailable or confidentiality is preferred)

Country offices may also set up a national toll-free hotline, where possible.

**[Annex 10] Safeguarding Incident Reporting Form**

**Safeguarding Incident Reporting Form**

*(See Annex 6. in the policy document)*

After you fill out this form, you can send it via email or submit it in person to your direct supervisor or local/national/global safeguarding focal point – whomever you feel comfortable. Or send it anonymously or in name to [safeguarding@goodneighbors.org](mailto:safeguarding@goodneighbors.org) as you wish. (Email subject: CONFIDENTIAL)

**Are you afraid of any reprisals for submitting this report? Do you feel you need any further protection?** (\*If you want us to keep this submitted information confidential to individuals except for the designated safeguarding focal point, please select 'Yes'.)

Yes

No

**Are you filling out this form on behalf of someone else?** (\*For example, you are a safeguarding focal point or a colleague who have heard or known of safeguarding concerns or violations from different channels.)

Yes

No

**Have you or anyone else already reported this incident to local authorities like**

**police?**

Yes

No

**When did the incident take place?**

If you don't know exact date, please write down estimated date of the incident.

**Location of incident**

Please write as specific as possible. (country/ region/ town or city/ exact location)

**Type of incident**

Child safeguarding incidents

Adult safeguarding incidents

Digital safeguarding incidents (e.g. violations of communications and social media guideline)

Fraud, bribery and corruption

Risks or harms in programming or during activities by GN

Safety or security concerns

Personal data protection and privacy

Other: \_\_\_\_\_

**Person(s) who allegedly caused the incident**

Good Neighbors employee

Partners (e.g. contractors, interns, volunteers, consultants, researchers, visitors, suppliers)

Good Neighbors Program Participants (e.g. children, vulnerable adults)

Community member

Local authority (e.g. government official, police)

Unknown

Not caused by a person

Other: \_\_\_\_\_

**Is any senior staff involved in this incident?**

Yes

No

**Further details of incident**

Please write down what happened – only facts – as specific as possible

**Action taken and by who (if any)**

**What urgent support or care is needed (if any)**

Please write if emergency support or care is required for those harmed by the incident.

**Reporter's information**

Unless you want to remain anonymous, we ask you to provide following information

to proceed a full investigation.

**First name** (If you want to remain anonymous, please write 'Anonymous' here)

**Last name** (If you want to remain anonymous, please write 'Anonymous' here)

**Email address**

**Phone number including country code**

**\* If you have any supporting documents or evidence, please attach them when you send email to [safeguarding@goodneighbors.org](mailto:safeguarding@goodneighbors.org).**

### Examples of incidents to report & incidents not to report<sup>14</sup>

Here are some examples of incidents to report and incidents not to report provided for your understanding.

<b>Incidents to report</b>	<ul style="list-style-type: none"> <li>• A beneficiary (program participant) or other individual connected with the GN's activities has/alleges to have suffered serious harm</li> <li>• Allegation that an GN employee has physically or sexually assaulted or neglected a beneficiary (program participant) while under the GN's care</li> </ul>
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<sup>14</sup> These listed examples are brought from Charity Commission's Guidance on What to Report (link below)

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/752170/RSI\\_guidance\\_what\\_to\\_do\\_if\\_something\\_goes\\_wrong\\_Examples\\_table\\_deciding\\_what\\_to\\_report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/752170/RSI_guidance_what_to_do_if_something_goes_wrong_Examples_table_deciding_what_to_report.pdf)

	<ul style="list-style-type: none"> <li>• The senior management of the GN has been suspended pending the outcome of an investigation into their alleged sexual harassment of a fellow employee</li> <li>• A GN employee computer is found to contain images of child pornography</li> <li>• An internal investigation has established that there is a widespread culture of bullying within the GN</li> <li>• A beneficiary (program participant) or individual connected with the GN's activities has died or been seriously harmed; a significant contributory factor is the GN's failure to implement a relevant policy</li> <li>• GN failed to carry out comprehensive background and identity checks which would have identified that an employee or board member was disqualified in law (under safeguarding legislation) from holding that position</li> <li>• GN discovers that an employee or volunteer coming into contact with children or at risk adults is on the sex offenders register</li> </ul> <p><b>Incidents involving partners</b></p> <ul style="list-style-type: none"> <li>• A delivery partner of the GN has ceased to operate and this has prevented GN from providing appropriate assistance to beneficiaries (program participants)</li> <li>• Staff of the partner organization are found to have been committing systematic abuse of beneficiaries (program participants) and this has significantly damaged the reputation of GN</li> </ul>
<p><b>Incidents not to report</b></p>	<ul style="list-style-type: none"> <li>• Minor unusual/aggressive behavior by a beneficiary (program participant) towards an GN employee</li> <li>• Police called to GN because a beneficiary (program participant) is drunk and disorderly</li> <li>• GN becomes aware of allegations of abuse or neglect of a beneficiary that occurred outside the GN; GN has reported the allegations to the appropriate agencies, and there is no harm to GN's reputation</li> <li>• Minor accidental injury to a GN service beneficiary (e.g. slipping on a wet floor)</li> </ul> <p><b>Incidents involving partners</b></p> <ul style="list-style-type: none"> <li>• A serious incident has taken place involving a partner but it has no or minimal impact on the GN's reputation or the partner's ability to deliver its work with GN</li> <li>• A delivery partner of the GN has ceased to operate and this has had some impact on the GN's ability to provide assistance to its program participants but it is not a material impact and the assistance to program participants hasn't stopped</li> </ul>

All GN partnership countries and global office make sure that any attempts or actual retaliatory actions against survivors or whistleblowers or reporters are not tolerated. Also, whoever makes an allegation that s/he know to be false or is found to be with malicious intent will also be subject to disciplinary action being taken. If partners who work with and for us, these actions may result in termination of their relationship with GN.

It is important that all GN partnership countries and global offices make available the contact information of all their safeguarding focal points and national/global hotline to the public so anyone with concerns or allegations that violate the policy can report without any difficulties. This information may be posted on the below channels.

- Your country/office's official website
- SNS
- Offices and/or meeting rooms
- Community centers or any other public space in the community (for community members)

See the below GN safeguarding reporting and responding flowchart. Responding procedures differ depending on the types of the reports as below.

### **(1) Internal reports**

First is “internal” reporting known as any alleged or known child and vulnerable adult abuse by our GN staff, partners and all those associated with GN’s work or taken place within GN project and activity. All these cases should also be reported immediately or within 24 hours to the given reporting channels.

Once the focal point receives a report, proceed with internal responding procedure as provided in detail in VIII. Responding Procedures.

### **(2) External reports**

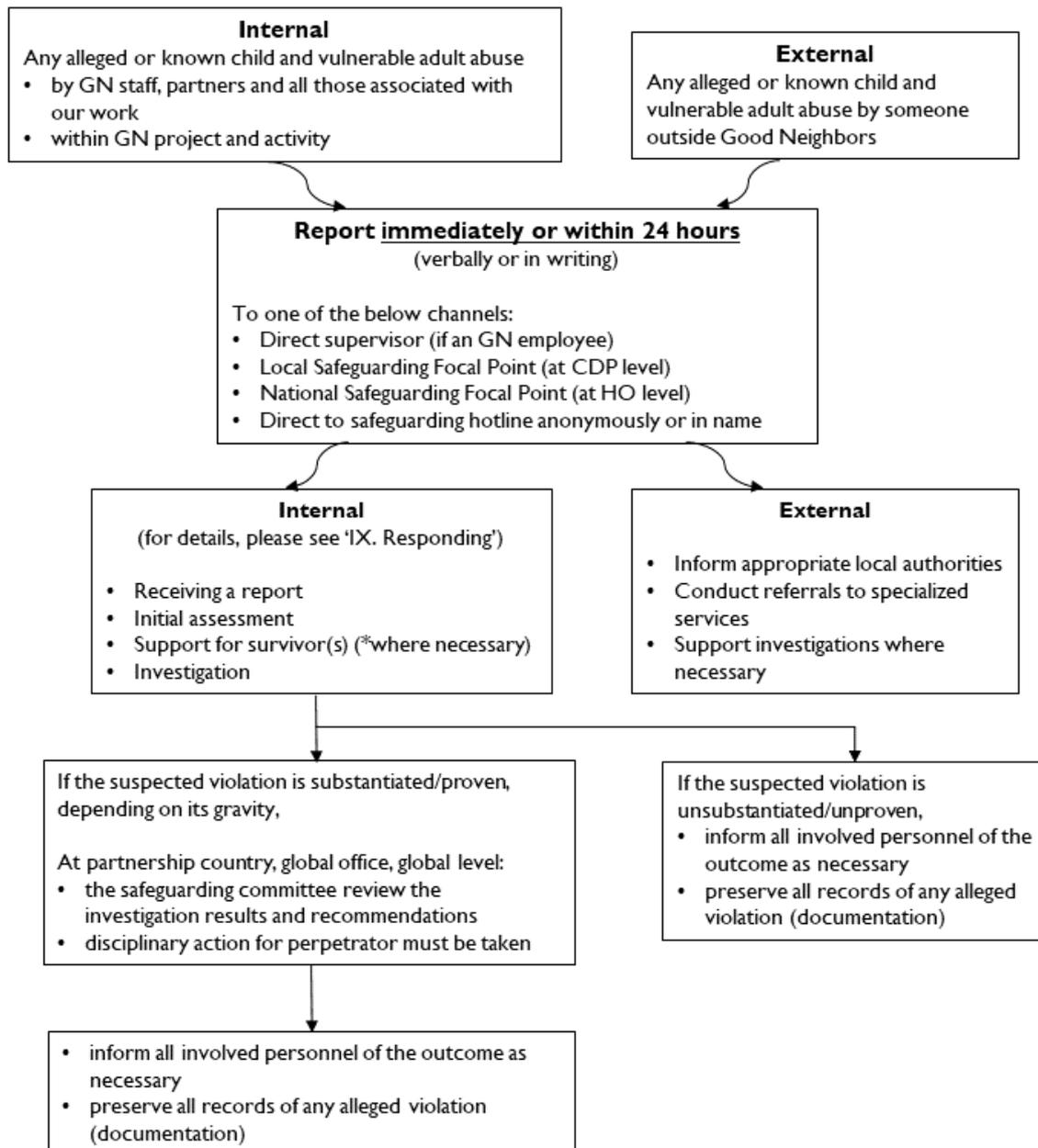
Second is “external” reporting known as any alleged or known child and vulnerable adult abuse by someone outside GN. This external reports may include the following cases, but not limited to:

- GN becomes aware of allegations of abuse or neglect of a beneficiary that occurred outside the GN

- GN receives a report on an unusual/aggressive behavior by a beneficiary (program participant) towards another community member in the GN project site

Depending on the country's legal requirements, GN reports this type of allegations to the appropriate local authorities or agencies if there is no harm to beneficiaries (program participants) and GN's reputation. Conduct referrals to specialized services and support investigations where required. All records of the received external reports shall also be logged.

## Good Neighbors Safeguarding Reporting and Responding Flowchart



## VIII. Responding Procedures<sup>15</sup>

### 1. Receiving a report

National SFP in collaboration with the Committee should establish diverse channels so that reporting on safeguarding could reach the SFP in a rapid and efficient manner. This may be in a structured format such as reporting form, email, text or message on social media. It could also be in the form of informal discussion or rumor. If an employee hears something in an informal discussion that s/he believes is a safeguarding concern or violation, they should report it to one of the channels below.

- Direct supervisor (if an GN employee)
- Local Safeguarding Focal Point (at CDP level)
- National Safeguarding Focal Point (at HO level)
- Safeguarding hotline anonymously or in name at [safeguarding@goodneighbors.org](mailto:safeguarding@goodneighbors.org) (if the above options are unavailable or confidentiality is preferred)

If a safeguarding concern is reported or disclosed to one of the GN employees, the person who is receiving the report should keep the following in mind.

- Listen and empathize with the person
- Ask who, when, where, what but not why
- Double check with your understanding of the situation
- Report to the designated focal point

Then, the person receiving the report should document what s/he collected from the reporter, using a safeguarding incident reporting form (see Annex 10), and submit it to your designated safeguarding focal point (local or national or global) immediately or within 24 hours.

If a direct supervisor or local safeguarding focal point becomes the first point of contact for the report, they must report it to their national safeguarding focal point. Then, the national safeguarding focal point is obliged to report it to the global safeguarding focal point and their regional coordinator (if a field country).

- Make sure that every received report should be submitted to the global safeguarding focal point (regardless of its severity)

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<sup>15</sup> Details of the procedures and examples are brought from Bond Safeguarding Dealing with Safeguarding Reports and CHS Alliance's Guidelines for Investigations.

Since safeguarding concerns and related information are sensitive, confidentiality must be maintained during all stages of the reporting process. It could only be shared on a limited 'need to know' basis.

If the person who reported thinks that the report is not being addressed and handled appropriately, s/he is given a right to escalate the report up to the senior management. Ensure that the person who reported will be protected from any retaliation as a result of the report.

## **2. Initial assessment: assess how to proceed with the report**

The national safeguarding focal point carries out initial assessment in consultation with the local safeguarding focal point (where necessary), once the reported incident is reported to the global safeguarding focal point. S/he determines whether it is feasible to take the report forward.

- Does the reported incident represent a breach of safeguarding policy?
- Is there sufficient information to follow up the report?

If the reported incident represents a breach of the policy, the national safeguarding focal point takes the report forward for investigation. If the reported incident does not represent a breach of the policy but represents a potential safeguarding risk to others, appropriate actions should be taken such as referrals to the appropriate channels (e.g. local authorities) if it is safe for the victim or survivor.

If there is insufficient information to follow up the report and no way to clarify or ascertain the information (for example, the reporter made a report anonymously and did not leave any contact details), the report should still be filed in case of future use and for its wider use of lesson learning and strengthening risk management practices. If decided to look for further information to provide sufficient information, this needs to be done very carefully. Information gathering should be done in a way that does not jeopardize a potential investigation (for example by making the potential subject of complaint, witnesses or other stakeholders aware that a complaint has been made), or present a protection risk to anyone concerned.<sup>16</sup>

According to the legal requirements or the national safeguarding focal point assesses whether the safeguarding concern should be reported to appropriate local authorities, s/he reports it accordingly unless it is likely to cause any further harm to a victim or survivor.

It is important to clarify what, how and with whom information will be shared. The related information should be kept confidential and shared on a need to know basis at

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<sup>16</sup> CHS Alliance (2015). Guidelines for Investigations. p.11

all times. All records relating to every reported incident should also be properly documented and retained.

Check your obligations on informing a donor or a funding organization when you receive a safeguarding report. Some of the donors or funding organizations may require you to inform them when receiving a report, others may require information on completion of the case or annually.

### 3. Support for survivors

The local and/or national safeguarding focal point provides appropriate support to survivor(s) of safeguarding incidents or allegations. Even if the report has not been investigated yet, it should be provided as a duty of care. Survivor(s) must be supported and protected throughout the entire procedures of handling the case. All decision making on support should be done by the survivor upon their request. Support could include, but not limited to:

- Psychosocial care or counseling
- Medical assistance or health care
- Legal support
- Material services
- Child support
- Referrals to other specialists

### 4. Investigation



**Key steps of an investigation**

The national safeguarding focal point decides to undertake an investigation when:

- There is sufficient information to constitute a report/allegation and
- Evidence is required to determine whether or not the report/allegation can be upheld

Country representative (or country director or equivalent), regional coordinator, global safeguarding focal point and/or director of HR department at GPC will need to appoint an investigation team. The investigation team comprises a national safeguarding focal point of the country (as an investigation manager), investigators, in some cases, observers, interpreters and external experts. When choosing the investigation team members, size of the team, their qualifications, ToR and the budget for the investigation should be taken into account.

### Investigation team

An investigation team under the responsibility and supervision of the National SFP should be established based on the capacity and resources available to each partner country. The investigation team can include the following personnel.

<b>Investigation manager (national safeguarding focal point)</b>	Every investigation team has at least one manager (national safeguarding focal point) directly supervising the case and reporting to the country representative and global safeguarding focal point and other selected senior managers on a 'need to know' basis.
<b>Investigators and observer</b>	Two investigators ideally work on every investigation. But if only one investigator is available, it is strongly encouraged to appoint an independent observer to accompany interviews and give feedback and support to the investigator.
<b>Interpreters</b>	If investigators speak the language of witnesses or interviewees or any other persons involved, interpreters may not be needed. But if this is not possible, an interpreter will be chosen who is appropriate, independent and competent and understands the nuances of witnesses' language. The interpreter must keep all information collected during the interview confidential and directly interpret what the witness say without any personal opinion or inference.
<b>External experts</b>	In some cases, external expert advice or assistance is needed. They are commonly lawyers with in-country legal expertise, skilled and trained specialists for interviewing children or persons with disabilities and computer specialists.

Upon the receipt of the report, the investigator should find out whether the reporter or anyone else is immediately at safety risk. S/he should put those risks as priority and refer the concerns to a competent colleague and inform the investigator manager

(national safeguarding focal point) and collaboratively respond appropriately to prevent and reduce those risks.

Once the investigation team is appointed, the team develops an investigation plan with the purpose of the investigation, constraints and questions under investigation. It is important to know that investigators are not prosecutors and their job is to gather all relevant information and evidence to determine whether the exploitation or abuse really occurred, make conclusions based on the investigation results and hand it to the investigator manager and the safeguarding committee to review and make decisions.

Below is the sample investigation plan you may use or adapt it to your own context as needed.

### [Annex 11] Sample Investigation Plan<sup>17</sup>

#### What is/are the allegation/s? Is/are investigation/s needed?

Allegation	Is an investigation needed?	Priority
e.g. sex with a child	Yes	1
e.g. marital infidelity	No	

#### What are the elements of the alleged breach?

Alleged violation	Law	Specific element to be proven
e.g. sex with a child	GN safeguarding policy Code of Conduct	<ul style="list-style-type: none"> <li>• Actual or threatened physical intrusion</li> <li>• Sexual nature</li> <li>• By force or under unequal or coercive conditions</li> <li>• Victim under 18 years of age</li> </ul>

#### Who will be interviewed?

Name	Role in complaint	Age	Language	Interpreter needed	Health and protection needs	Location	Priority
John	Victim	12	English	No	✓	School Nairobi	2

<sup>17</sup> From CHS Alliance, Guidelines for Investigations, November 2015


### What information do you have? What information do you need?

Information about witness	Information known:	
	Yes	No
1. age		
2. preferred name		
3. race, culture, ethnicity, religion, and first language		
4. gender and sexuality		
5. disability and impairment, cognitive ability, linguistic ability		
6. health needs		
7. current emotional needs		

### Circumstances

Additional information on the victim	Information known:	
	Yes	No
1. family members, care-takers and nature of relationships		
2. routines (attendance at school, work, care for children)		
3. aid provision (what they are receiving, who provides it, is it still accessible)		
4. recent changes in circumstances contributing to vulnerability and/or reliance on others		
5. previous allegations of abuse		
6. whether witness is currently safe		

### Alleged incident

	Information known:	
	Yes	No
1. what type of and how many alleged incident(s)?		
2. what happened immediately before incident?		
3. what happened during incident?		
4. what happened immediately after incident?		
5. how did the subject of complaint come into contact with the victim?		
6. how did the complaint come to the attention of investigators?		

### Details of exploitation/abuse

	Information known:	
	Yes	No
1. survivor's relationship with any protective adult and their reaction to complaint i.e. spouse, parent		
2. frequency and duration of abuse		
3. co-existence of different form of abuse		
4. single or multiple subjects of complaint		
5. degree of violence and aggression used		
6. level of threat to life (e.g. withholding of food, water or essential items from victim or others on behalf of victim)		
7. form of coercion		
8. whom the victim has told		

### Considerations

	Questions asked:	
	Yes	No
1. initial investigative findings (full record to be kept)		
2. need for support and/or intermediary/interpreter		
3. potential blocks to communication and methods for dealing with them		
4. willingness to talk to investigators		
5. the witness is currently in a safe environment		

### Planning the interview

Set objectives for interview and decide:	Decision made	
	Yes	No
1. has the objective of the interview been set?		
2. who will be present and who will lead the interview?		
3. where the interview will take place?		
4. when the interview will take place?		
5. how long will the interview last and the need for breaks?		
6. what is likely to happen after the interview?		

### Identification of vulnerable and/or intimidated witnesses

	Questions to ask before:	
	Yes	No
1. does the witness have a physical/learning impairment?		
2. does the witness have an identified mental health difficulty?		
3. what is the witness's current emotional state?		

4. what is the relationship between the witness and the subject of complaint?		
5. how the nature of the offence, i.e. levels of violence and aggression may impact on witness accounts		
6. does the subject of complaint have access to the witness?		
7. is there evidence of previous intimidation by the subject of complaint or any other party towards the witness?		
8. is the witness also a victim?		

Secure evidence that is relevant to deciding if an allegation is true or not. The most common forms are witness testimony (e.g. statement about what someone saw, heard, smelt, etc.), documentary evidence (e.g. forms, photographs, videotapes, computer files), physical evidence (e.g. examinations of the site of the alleged abuse), and expert evidence (authoritative opinions about whether something is likely to have occurred).

In order to complete the investigation, it is necessary to gather evidence on each of the elements. It is recommended to begin by making a checklist of the elements and the type of evidence.

Based on the information gained from gathering evidence, update the investigation plan. The secured evidence may reveal new information.

In most of investigations, the reporter/complainant and the subject of complaint will be the key witnesses. Once the investigators have identified the people to interview, they should prepare a list of witnesses and experts.

One of the two investigators should take notes for the entire interview. The below information collected in the form should be recorded as soon as possible once the interview is completed.

#### [Annex 12] Sample Record of Interview<sup>18</sup>

<b>Investigation officers</b>	
<b>Investigation officer</b>	
<b>Investigation officer</b>	
<b>Observer (if present)</b>	
<b>Interpreter (if present)</b>	
<b>Persons interviewed</b>	
<b>Name of the person</b>	
<b>ID verified (yes/no)</b>	
<b>Nationality</b>	

<sup>18</sup> From CHS Alliance, Guidelines for Investigations, November 2015

<b>Occupation/title</b>	
<b>Interview details</b>	
<b>Date</b>	
<b>Language of interview</b>	
<b>Place of the interview</b>	
<b>Transcript of the interview</b>	
<b>Detailed record of questions asked and interviewee's responses</b>	
<p>The interview starts at: (time)</p> <p>Do you have any preliminary questions?</p> <p>Are you ready to start the interview?</p> <p>List up as many questions as you might need to gather sufficient information from the witness.</p> <ul style="list-style-type: none"> <li>•</li> <li>•</li> <li>•</li> <li>•</li> <li>•</li> </ul> <p>The interview ends at: (time)</p> <p>This is a true and accurate record of the interview.</p> <p>1) <u>For the interviewee</u>: In accordance with the procedure outlined in (name of organization) reporting procedures, I, the undersigned, declare to understand that my statement may be used in a disciplinary procedure and could be shared with staff under investigation, unless management advises that this would affect my security.</p> <p>Date and signature:</p> <p>2) <u>For the witness/interpreter to the interview</u>: I, the undersigned, undertake not to divulge any confidential information to which I have had access in the exercise of my capacity as witness/ interpreter to the present interview.</p> <p>Date and signature:</p> <p>3) Date and signature of the investigation officer(s):</p>	

Then, the investigation report should be written along with investigators' conclusions. The investigators collaboratively prepare the report and the investigator manager (national safeguarding focal point) confirms the report to be submitted to the safeguarding committee.

## [Annex 13] Investigation report<sup>19</sup>

The Report should be structured in the following way:

- Title page
- Table of contents
- Executive summary
- Introduction and preliminary remarks
- Methodology
- Investigative findings
- Conclusions and recommendations
- Annexes

### **i. Executive summary**

The executive summary provides the reader with a concise overview of the investigation from the time the organization received the allegation through to the writing of the report. It should not contain any information, which is not in the main body of the report.

### **ii. Introduction**

The introduction contains:

- the name/s or case reference number of Subject of Complaint/s
- date of the report
- a confidentiality statement
- information about the nature of the complaint and references to the standards allegedly breached
- information about the scope of the investigation (number of complainants, witnesses, Subject of Complaints etc.)
- any constraints to the investigation (e.g. locations not visited due to insecurity etc.)
- brief contextual information (e.g. country, refugee camp etc.).

### **iii. Methodology**

The methodology sets out:

- the process used during the investigation
- the evidence required
- the interviews conducted

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<sup>19</sup> From CHS Alliance, Guidelines for Investigations, November 2015

- any impediments to the investigation (i.e. lack of cooperation or unwillingness by any witness to be interviewed).

#### iv. Investigative findings

The investigative findings summarize the evidence relevant to each alleged complaint; they will be used to draw conclusions. A table such as this could be used:

<b>Complaint</b>		
<b>Clause of policy alleged to have been breached</b>	<b>Evidence to uphold alleged breach</b>	<b>Evidence to refute alleged breach</b>
1.		
2.		
3. etc.		

#### v. Conclusions

The conclusions tell the reader whether or not the evidence supports each complaint as alleged. It is important that the conclusions are clearly stated for each alleged complaint.

The investigation will result in one of the following three conclusions:

- “established by reasonable inference”
- “not established due to insufficient or unclear evidence”
- “not established based on evidence to clear the Subject of Complaint or to establish a malicious complaint”

A table such as this could be used, using the alleged breaches of policy from the previous table:

<b>Alleged breach of policy</b>	<b>Conclusion</b>
1.	
2.	
3. etc.	

The templates and main source for this section were brought from CHS Alliance’s Guidelines for Investigations. For more detailed steps for undertaking an investigation, refer to the following guidelines.

[Click here to see guidelines for investigations provided by CHS Alliance](#)

## 5. Decision making on the outcome of the investigation

If the alleged violation turns out substantiated:

- **At partnership country and global office level:** National Safeguarding Focal Point convenes a safeguarding committee with an approval and engagement of the Representative of country or global office. Then, the committee reviews the investigation results and recommendations and determines corrective or remedial actions for perpetrator depending on its gravity in consultation with the relevant Regional Coordinator (if a field country). However, when the National Safeguarding Focal Point and the committee evaluate that the severity level of the case is high and needs advice from global senior management, s/he may escalate it to the global level for their review and disciplinary actions. If in the case the representative of the country or global office is involved in the alleged violation, the National Safeguarding Focal Point shall directly report to the Global Safeguarding Focal Point (GPC) and relevant Regional Coordinator (if a field country).

The **national** safeguarding committee may include:

- Representative of the country or global office (or equivalent)
- National safeguarding focal point
- Regional coordinator
- One or more safeguarding expert (child protection, PTSD, SGBV, etc.)
- HR director or manager (in country)
- Other relevant senior managers

- **At global level:** For all the received reports from GN partnership countries and global offices due to escalation, the Global Safeguarding Focal Point convenes a safeguarding committee with an approval and engagement of the GPC Secretary General. The committee reviews the investigation results and recommendations and determines disciplinary action for the perpetrator.

The **global** safeguarding committee may include:

- GPC Secretary General

- Global safeguarding focal point
- One or more safeguarding expert (child protection, PTSD, SGBV, etc.)
- HR director or manager (GPC)
- Other relevant senior managers

If the alleged violation is unsubstantiated:

- All involved personnel are informed of the outcome as necessary.
- Preserve all records of allegations (documentation)

For all alleged violations, whether substantiated or unsubstantiated, must be preserved properly. Inform all involved personnel of the outcome (on a need-to-know basis).

For handling external reports concerning any alleged child and vulnerable adult abuse by someone outside Good Neighbors

- Ensure that all GN partnership countries and global offices report to the relevant local authorities where appropriate, conduct referrals to appropriate specialized services and support investigations where necessary.

Countries and offices may use the following sample for a database of disciplinary measures. Ensure data protection and confidentiality by storing file securely and making it available only to the selected relevant individuals (e.g. password protected, not in a shared folder). If the country office keeps hard copy records, make sure this is safely stored in a locked cabinet.

**[Annex 14] Sample database of disciplinary measures**

Name of staff member	Contract start date	Contract end date	Type of misconduct alleged	Allegation substantiated/ unsubstantiated	HR focal name	Comments

**IX. Risk Assessment and Management (Safe Programming)**

Risk Assessment and Management is an ongoing exercise related to program operations. It is recommended that country, field and CDP offices perform a Risk

Assessment at least on a yearly basis. Risk Assessments for specific projects or programs should be carried out separately and adapted to the requirements of specific donors or partners. As risks are dynamic and can evolve very quickly in certain situations of fragility, vulnerability or any major social, economic or political changes, frequency should be adapted based on the context (bi-annually, quarterly, monthly, weekly, etc.).

Risk Management requires preventing the occurrence of risks through the identification and implementation of appropriate mitigation strategies, commensurate to the probabilities and potential impacts of each risk. Risk Management also includes monitoring, responding to and learning from any potential risks that may occur.

The main source for this guideline is the [RSH Nigeria: Safeguarding \(or SEAH\) risk assessment and management tool](#). It is recommended by international safeguarding experts. Please adapt it to your country and local context as needed.

#### i. Steps of the Risk Assessment and Management Cycle

<b>Step 1: Initial Risk Assessment</b>	<b>Step 2: Mitigation Plan</b>	<b>Step 3: Monitoring and Adaptation</b>	<b>Step 4: Learning and Revisiting Assessment</b>
<ul style="list-style-type: none"> <li>• Use the Guiding Questions to identify risks</li> <li>• Use the Risk Register (Annex 15 below) to not these down</li> <li>• Assign a probability of occurrence (see section ii)</li> <li>• Assign a score related to gravity of potential</li> </ul>	<ul style="list-style-type: none"> <li>• For each risk, identify some Mitigation Approaches</li> <li>• For each risk, choose one or a few Mitigation Approaches to be your Mitigation Strategy based on effectiveness and feasibility criteria</li> <li>• Allocate resources, responsibilities</li> </ul>	<ul style="list-style-type: none"> <li>• Monitor and report on mitigation actions taken</li> <li>• Follow a periodic update timetable (e.g. every 3 months)</li> <li>• Adapt programs and mitigation based on results from monitoring</li> </ul>	<ul style="list-style-type: none"> <li>• Revisit the entire Risk Assessment based on a new analysis</li> <li>• Update Risk Register</li> </ul>

impacts (see section ii)	and timeframes		
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## ii. Scoring Risks

Probability or likelihood of occurrence	Gravity of negative impacts for affected populations and for the organization's reputation	Computation of overall risk score: likelihood x impact
<ul style="list-style-type: none"> <li>Highly likely (grade 3, color red)</li> <li>Likely (grade 2, color orange)</li> <li>Unlikely (grade 1, color yellow)</li> </ul>	<ul style="list-style-type: none"> <li>High impact (grade 3, color red)</li> <li>Moderate impact (grade 2, color orange)</li> <li>Low impact (grade 1, color yellow)</li> </ul>	<ul style="list-style-type: none"> <li>High (7 to 9)</li> <li>Medium (4 to 6)</li> <li>Low (1 to 3)</li> </ul>

## iii. Guiding Questions

Download the Guiding Questions at the following [link](#). This RSH Nigeria: Safeguarding (or SEAH) risk assessment and management tool is recommended by international safeguarding experts. Please adapt it to your country and local context as needed. The Guiding Questions are divided in six different thematic areas:

1. External Environment;
2. Programs;
3. Partnerships;
4. Communications & information management;
5. Human resources;
6. Governance, culture & leadership.

Depending on the purpose of the Risk Assessment, you may focus on some areas more than others. For instance, the National Safeguarding Focal Point may want to be comprehensive in their analysis, including all areas. Conversely, a Project Officer designing an intervention may focus more on areas 1, 2 and 5.

As you identify risks, please note them down in the Risk Register (see Annex 15 for the template to complete). For each risk, fill in the required information. This tool allows to have a snapshot of the overall risk situation and mitigation actions.

### [Annex 15] Risk Register

Download the template to fill in at the following [link](#). This RSH Nigeria: Safeguarding (or SEAH) risk assessment and management tool is recommended by international safeguarding experts. Please adapt it to your country and local context as needed.

## **X. Community feedback and complaints mechanism**

In order to ensure children and community members raise their concerns or complaints to Good Neighbors effectively, consult with them first to determine contextually-relevant reporting mechanisms. It should be made available, visible and accessible to all children and community members with special consideration of accessibility (e.g. language, physical accessibility, communication).

Induction session with all project participants to inform them of their rights and of the complaints reporting mechanism put in place so they know how to report misconduct by GN employees or partners or safeguarding violations during project operation. They can always give feedback or suggestions on reporting mechanism.

The field country – a local or national safeguarding focal point – in consultation with the project manager ensures raised concerns and complaints are appropriately responded in a fair and timely manner according to the procedures.

All children can submit their complaints directly to Good Neighbors – a local safeguarding focal point or project manager or CDP manager – without consent from their parents or responsible adults.



**[Example C] Children submit their complaints through complaint boxes established at schools (Photos and case stories provided by GN Tajikistan)**

## **XI. Communications, Social Media and Digital Safeguarding Guideline<sup>20</sup>**

This guideline sets out Good Neighbors approach to digital safeguarding in all communication materials and digital spaces including but not limited to social media, online platforms, websites, photographs, videos, articles, and other communication materials. This applies to all GN employees and partners globally both during and outside working hours.

### **Good Neighbors digital safeguarding principles and commitments**

- Respect the dignity and rights of the child or vulnerable adult we serve when interviewing, photographing, filming or publishing content.
- Ensure images or videos of children and vulnerable adults are portrayed with dignity, not helpless, sexually provoking or distorted.
- Obtain informed consent from the child or vulnerable adult before photographing or filming. When possible, the consent should be in writing. If the primary subject is a child, ensure to obtain informed consent from both the child and their guardians.
- When interviewing and filming, pay attention to provide the accurate context and facts of the child or vulnerable adult with appropriate understanding of their culture and traditions.
- Photos and videos taken where the child or vulnerable adult have not given permission cannot be used. In addition, they cannot be reproduced, electronically copied or disseminated without GN permission.
- Companies, media staff and other relevant stakeholders directly involved in taking photos or videos must not use media contents for profit or commercial purposes
- When publishing the media content, decide to either use the subject's real name or change the name in accordance with their decisions through the given consent form

### **Interviewing, photographing or filming**

#### **1. Before interviewing, photographing or filming**

- Thoroughly assess any potential harm or benefits if photographing/filming activities would be of help to the child, vulnerable adult, their family and local community

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<sup>20</sup> From the policy, 'XI. Communications, Social Media and Digital Safeguarding Guideline'

- Make certain that all companies, media staff and other stakeholders directly involved in taking photographs or films for fundraising or promotional purposes should receive orientation on GN Safeguarding policy and Communications, Social Media and Digital Safeguarding Guideline and sign the consent form prior to their activity (see Annex 16).

### [Annex 16] Consent form for media & communications activities

※ This Consent Form applies to external media staff members from the press including broadcasting, newspapers, magazines who visit Good Neighbors partnership countries or global offices to photograph or film; this Form aims to pledge that they have understood the Good Neighbors Child and Adult Safeguarding Policy and behave in compliance with the Communications, Social Media and Digital Safeguarding Guideline.

#### **CONSENT FORM FOR MEDIA & COMMUNICATION ACTIVITIES**

**(\*For external media and communications staff only)**

I have fully read and understood the GN Communications, Social Media and Digital Safeguarding Guideline. I consent to comply with the guideline throughout the entire process of media and communications activities including interviewing, photographing/filming, marketing and publishing the media contents to prevent any harm in communications and to ensure images and stories of the children or vulnerable adults are portrayed with dignity and based on the facts.

This consent form shall have effect for a period of two (2) years from the date on which it has been signed as indicated below.

Date:

Name:

Signature:

- Be sure to receive the Consent Form for Gathering Personal Information and Sharing Content Online & Communication Materials (see Annex 17) from the child or vulnerable adult. If the primary subject is a child, obtain informed consent from both the child and their guardians. Make sure that the subject is fully aware of the purpose and scope of interviewing, photographing, filming and contents of coverage and that his/her story might be disseminated globally. If necessary, clearly explain the details in the language which they are able to comprehend. When it is difficult to receive a written consent depending on the circumstances (level of literacy, eyesight, etc.), receive a verbal consent (tape-recording).

**[Annex 17] Consent form for gathering personal information and sharing content online & communication materials**

	<b>Person in charge</b>
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**Who is Good Neighbors?**

Good Neighbors is an international humanitarian development NGO founded in 1991 to make the world a place without hunger, where people live together in harmony. GN is currently working in *47 countries* and we would like to use your story, photo or video in our communication materials or online platforms to support our work around the world.

**Purpose of gathering and sharing content**

Your story/photo/video may be used on websites, social media or our publications to tell the world about our work and raise funds to better support our work for the vulnerable groups and communities. It may also be used by GN offices and our partners we work with.

**Use of your real name in our communications (choose one):**

You give us permission to use your real name in our communications.

If you wish, it is your right to ask us not to use your real name on media or our reports. If you want us to change your name to protect your identity, please check and suggest a name that you prefer to be used: \_\_\_\_\_.

**For further use of your story or image**

After you engage in interview, photography or filming with us, if you would like to know more details about how your story, photo or video has been used by GN or later you find out that you don't want your story or image to be used anymore please contact us via email provided or GN office in your country.

**By signing this form, I give my permission for my story/image to be used and shared online or any other communication materials by Good Neighbors.**

<b>Full name (real name)</b>	<b>Gender</b>	<b>Date of birth (age)</b>
<b>Address</b>	<b>Phone number</b>	<b>Email</b>
<b>Signature</b> <input type="text"/>	<b>Date</b> <input type="text"/>	
<b>Parent or guardian <u>(if you are under 18)</u></b>		
<b>Name of parent or guardian</b>	<b>Relationship with the child</b>	
<b>Signature</b> <input type="text"/>	<b>Date</b> <input type="text"/>	

- Notify the subject that they can either be alone or be with someone else who they feel comfortable when they are being interviewed and filmed.

## 2. During interviewing, photographing or filming

- Avoid causing sympathy by distorting the circumstances of the child or vulnerable adult and damaging their dignity on the account of disability, poverty, or any other reasons
- Do not manipulate the child or vulnerable adult by asking them to tell a story which is not theirs and avoid questions that evoke their pain from traumatic events in the past.
- Make sure that the subject's clothing or behavior is not provocative and sexually suggestive in order to prevent creating a misleading impression
- Do not ask any questions that might make the subject feel pressured or humiliated. When interpretation is required, consider the local culture and context of the subject to avoid distorting the contents of the conversation
- When dealing with sensitive issues such as prostitution, sex slavery, or pornography, coverage should be managed by same-sex executives, employees, and media staff; and the camera should not face the child in order to protect his/her identity from being exposed. Be mindful of the composition of the interview or filming to not present the subject as a criminal or a voluntary participant in criminal activities.
- Avoid activities that may cause mental damage to the child and vulnerable adult in crisis.

- Ask for the child's consent when covering privacy related contents (letters, diaries, etc.).
- Covering and filming should not be available when the child refuses to be covered and filmed even with the consent of their guardian.
- Personal use of the photographs or videos from the field is not allowed; confirmation and authorization from the representative and national safeguarding focal point of global office or partnership country is required when necessary.
- Do not discriminate the disabled child or adult in the process of covering and filming. Avoid degrading and discriminatory expressions of the disabled child or adult and expressions that put emphasis on the type and the status of the disability.
- In cases where secondary harm is expected (e.g. abused children or adults, persons with HIV/AIDS, child soldiers, etc.), be mindful to ensure the confidentiality and security of information when filming to prevent the subject from being harmed due to the disclosure of their identities.

### **Use of social media and digital technology**

All GN employees and partners working with GN should be mindful and responsible of using social media and other digital platforms in their professional and personal lives. Content shared via social media channels and digital technology is often public and all representatives should make sure that every post and blogging as part of GN's work adheres to the GN Safeguarding Policy and its principles by respecting and protecting the dignity and right of children and vulnerable adults we support.

- Always be mindful that any content via GN's official social media or digital platforms may be accessible to children and other program participants of Good Neighbors.
- Communication team manager or person in charge of global offices and partnership countries are responsible for creating the online content and representative and national safeguarding focal point are responsible for overseeing the online content and consequences of their online activity
- Make sure that online and/or published content does not contain child or adult participant's personal information that leads them being identified such as location/address, family/school name and sponsorship ID number.
- Do not tag any children or vulnerable adults in social media posts
- If personal social media accounts or blogs are public, be cautious with the information not to expose any harmful, violent, threatening or abusive content

when posting pictures, stories or videos

- In case a child or adult participant sends a friend request to your personal account via social media, be sure to consult with the national safeguarding focal point for guidance how to deal with and proceed accordingly
- Do not use any photos, videos or stories of the child and vulnerable adult that have been obtained for purposes of GN's work for personal accounts without proper permission from the representative and national safeguarding focal point of global office or partnership country

### **Data protection**

- Ensure that data is securely stored and protected and do not disclose the personal information outside GN
- Use personal data only for the obtained purposes and remove it appropriately. Do not further use the information for any other reason.
- Limit the number of employees who can have access to collected data as small as possible
- Comply with local data protection legislation

### **Reporting digital safeguarding violations**

All GN employees and everyone who works with GN should report any suspected or known digital safeguarding concerns to the safeguarding focal point (local or national or global). Any failure to report them is a breach of GN's safeguarding policy and it could lead to a disciplinary action.

## **XII. Monitoring and Evaluation**

All GN partnership countries and global offices are responsible for ensuring the development, implementation, monitoring and evaluation of their safeguarding policies and procedures. Then, they should submit their safeguarding progress report (Annex 18, see below) to the global safeguarding focal point on an annual basis.

The global safeguarding focal point shall monitor the safeguarding progress across the organization and regularly report it to ISC and GPC Board. S/he will also review the policy annually and update it in accordance with proposed amendments by all relevant stakeholders from countries and offices or even outside experts. The proposed amendments and updated policy will be reviewed by ISC and approved by GPC Board.

### **[Annex 18] Safeguarding progress report form**

#### **1. Basic information**

- **Country/Office Name:**
- **Completed by:**
  - Name / Department / Position
  - Name / Department / Position
- **Reviewed by:** Name of Representative or Country Director
- **Number and percentage of employees who have completed online/offline safeguarding training**
  - Number of employees: OO
  - Percentage of employees: OO % (out of total employees)

## 2. Questionnaires for monitoring and evaluation of your safeguarding<sup>21</sup>

Place an X in the corresponding column based on your results of safeguarding activities.

	Questions	Completed by	Implemented	Partially implemented	Not implemented	Do not know	Comments
1	A contextualized national safeguarding policy is in place.	National safeguarding focal point (SFP)					
2	Management of the office has taken actions to create an environment where staff have confidence and mutual trust to report a safeguarding incident without any retaliation. Leaders actively encourage employees to fulfil their obligation to report.	Country director or representative (or equivalent)					
3	GN employees, board members, partners including volunteers, interns have acknowledged receipt in writing of the GN safeguarding policy.	National SFP					

<sup>21</sup> Some questions were brought and adjusted from WVI Safeguarding Monitoring and Evaluation Framework; others from CHS Alliance Guidelines for Investigations

4	Community complaints mechanism is in place and community members including children and women are provided with information on where, whom and how to report any complaints.	National SFP					
5	Safeguarding training/courses are included as part of all mandatory onboarding/induction processes for all employees, volunteers, interns. (e.g. via GN Academy, offline training)	HR manager					
6	Job advertisements and applications outline GN's commitment to safeguarding and candidates' obligation to comply with GN safeguarding policy.	HR manager					
7	Conduct reference checks and comprehensive background checks for the job candidates. In particular, those who have direct contact with children and vulnerable groups have had criminal record checks.	HR manager					

8	Interviews include questions to draw out candidates' attitudes and values in regards to protecting children and safeguarding adults.	HR manager					
9	All agreements with partner organizations/individuals include application and compliance to GN safeguarding policy.	Relevant team manager					
10	Visitors are trained on safeguarding prior to their field visits and their acknowledgement is received.	Relevant team manager					
11	All employees and partners are well aware of reporting and responding procedures.	National SFP					
12	Processes for dealing with complaints and other safeguarding concerns are fair and open to challenge through an appeals process.	National SFP					
13	Contact details for reporting services at local or national level are readily available. (e.g. national hotline, contact	National SFP					

	details for local/national SFPs)						
14	Clear disciplinary measures to any retaliatory actions against whistleblowers/reporters are in place.	National SFP					
15	All records and sensitive information relating to safeguarding incident are kept confidential, properly documented and shared on a need to know basis.	National SFP					
16	Appropriate support to victims/survivors are prioritized and provided in a timely manner.	National SFP					
17	All information relating to investigation is properly logged and retained. (e.g. evidence, investigation plan, record of interview, investigation report)	Investigation team or National SFP					
18	Appropriate and contextualized risk assessment and management for program operations are in place.	Relevant team manager					
19	Staff in charge obtain informed consent from the child or vulnerable adult before interviewing,	Relevant team manager (or communication s team)					

	photographing or filming.						
20	Digital safeguarding in all communication materials and digital space is well implemented and known to all staff and associated persons such as media staff.	Relevant team manager (or communications team)					

### 3. Managing safeguarding concerns/incidents

- **Number of received reports/allegations:** OO
- **Number of concerns involving children:** OO
- **Number of substantiated/unsubstantiated cases:** OO
  - Substantiated: OO
  - Unsubstantiated: OO
- **Number of persons involved in allegations**
  - Number of involved GN employees: OO
  - Number of involved GN volunteers or interns: OO
  - Number of other involved GN's partners: OO
- **Number of substantiated cases resulted in:**
  - Disciplinary warning: OO
  - Dismissal: OO

- Contract termination: OO
- Resignation: OO
- Other action: OO
- No action: OO
- Substantiated cases reported to authorities: OO

**4. Give your feedback or suggestions on the GN safeguarding policy and procedures for its improvement.**

### **XIII. References**

#### **A. General References**

- [Keeping Children Safe Child Safeguarding Standards and how to implement them](#)
- [Regional Toolkit for Protection from Sexual Exploitation and Abuse, Sexual Harassment \(PSEA/SH\) and Inter-Agency Community-Based Complaint Referral Mechanism in the Americas](#)
- [Digna Toolkits for Addressing PSEA](#)
- [Save the Children Safeguarding in Emergencies Toolkit](#)
- [Save the Children Child Safe Programming Guidelines](#)
- [IASC Six Core Principles Relating to Sexual Exploitation and Abuse, 2019](#)

#### **B. Safe Recruitment**

- [Lebanon PSEA Network \(2000\). Safer Recruitment 'Check List' and Guidance for Preventing Sexual Misconduct \(Version July 2000\)](#)
- [National College of School Leadership Safer Recruitment Workshop](#)
- Save the Children's Policy on Child Safeguarding (Reference No.: CS-01.5)

#### **C. Reporting & Responding Procedures**

- [CHS Alliance Guidelines for Investigations](#)
- Bond Safeguarding Dealing with Safeguarding Reports
- [Charity Commission's Guidance on What to Report](#)

#### **D. Risk assessment tools**

- [RSH Nigeria: Safeguarding \(or SEAH\) risk assessment and management tool](#)
- [Multi-Agency Sexual Exploitation Risk Assessment Tool](#)

#### **E. Monitoring and Evaluation**

- [CHS Alliance Guidelines for Investigations](#)
- WVI Safeguarding Monitoring and Evaluation Framework

#### **F. FAQs at "Safeguarding in humanitarian organizations: a practical look at prevention and response"**

- <https://odihpn.org/blog/safeguarding-humanitarian-organisations-practical-look-prevention-response/>

Here are key additional resources that may help you to set up and roll out are:

- GCPS Consulting UK for CHS Alliance, 2017, [PSEA Implementation Quick Reference Handbook](#).
- IASC, IOM, Save the Children, UNHCR, 2016, [Best Practice Guide: Inter-Agency Community-Based Complaint Mechanism: Protection against Sexual Exploitation and Abuse](#).
- IASC, May 2016, [Protection from Sexual Exploitation and Abuse \(PSEA\): Inter-agency cooperation in community-based complaint mechanisms: Global Standard Operating Procedures](#).
- IASC Task Force on PSEA, March 2004, [Model Complaints and Investigation Procedures and Guidance Related to Sexual Abuse and Sexual Exploitation](#).

## Annex A: Full Definitions

Definitions have been divided in three categories:

1. **Parties included in the GN safeguarding policy:** defines who is covered by the policy and the different parties that may emerge as a result of its application;
2. **General definitions:** includes the general issues covered by the policy;
3. **Child-specific definitions:** includes the issues specific to children.

### 1. Parties included in the policy

- **Complainant:** The person who raises a complaint or concern, which may or may not be the survivor.
- **Good Neighbors employees, board members and partners:** The term includes all employees of Good Neighbors partnership countries, global offices and affiliated organizations. It also includes board members, volunteers, interns, consultants, day laborers, contractors, implementing partners and their staff.
- **Subject of Complaint:** The person against whom an allegation, complaint or concern has been raised.
- **Survivor:** A person who has allegedly been subject of harassment, abuse or exploitation, whether of a sexual or any other nature
- **Vulnerable adult:** A person (age 18+) who has the functional, mental, or physical inability to care for themselves; is incapacitated; has a developmental disability; receives services from health and care agencies; or, for whatever reason, is unable to protect themselves against harassment, harm, abuse or exploitation of any sort.

### 2. General definitions

- **Allegation of misconduct:** A suspicion becomes an allegation if the relevant body decides to pursue an investigation on the reported complaint or concern.
- **Emotional Abuse:** A persistent attack on a child's or person's self-esteem, emotional and psychological well-being. Examples include name-calling, insulting, threatening, ridiculing, shaming, intimidating, manipulating and isolating, among others.
- **Female Genital Mutilation (FGM):** the practice of partially or totally removing the external genitalia of girl children and women for non-medical reasons.

- **Physical Abuse:** When someone willingly injures an adult or child, or threatens to harm them. It also includes practices that cause distress and harm, such as Female Genital Mutilation (FGM).
- **Safeguarding:** The policies, procedures, responses and practices employed to ensure that all children (any person under the age of 18), women and vulnerable adults, who come into contact with Good Neighbors and our partners, are protected from all forms of harm, abuse or exploitation. It involves the shared responsibility and preventative actions to make sure our employees, operations and programs do no harm to children and vulnerable adults and to ensure that Good Neighbors is a safe organization.
- **Sexual Abuse:** The actual or threatened physical intrusion of a sexual nature, by force, coercion or manipulation. This definition includes practices such as forced marriage, child marriage, sexual slavery and sexual activities with a child.
- **Sexual Exploitation:** Any actual or attempted abuse of a position of vulnerability, power differential or trust for sexual purposes, including any sort of profit both monetary or in kind.
- **Sexual Harassment:** Sexual harassment is any unwelcome sexual advance, request for sexual favor, act or gesture of a sexual nature, that may cause harm, mortification or offence.
- **Suspicion of misconduct:** A complaint or concern that has been raised through any of the reporting methods specified in this policy.

### 3. Child-specific definitions

- **Child:** Any person under the age of eighteen (18) years as per the 1989 Convention on the Rights of the Child (CRC).
- **Child Abuse:** Child abuse refers to the violation of children's rights and to all forms of violence against them: physical, emotional and sexual abuses, neglect, negligence, discrimination, family violence, sexual exploitation, abduction, trafficking, sexual trafficking, online child sexual exploitation and child labor. The main categories of child abuse are as follows: (1) Psychological and physical abuse, neglect, cruelty, sexual abuse and emotional maltreatment; (2) Any act by deeds or words which debases, degrades or demeans the intrinsic worth and dignity of a child as a human being; (3) Unreasonable deprivation of their basic needs for survival, such as food and shelter; or (4) Failure to immediately give medical treatment to an injured child resulting in serious impairment of their growth and development or in their permanent incapacity or death.
- **Child labor:** Often defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental

development. It refers to work that is mentally, physically, socially or morally dangerous, harmful to children, interfering with their schooling and recreation. The definition includes cases of children being enslaved, separated from their families, exposed to serious hazards and illnesses.

- **Child Marriage:** A formal marriage or informal union before age 18.
- **Child Protection:** The prevention of and response to harm, abuse, neglect, exploitation and violence against children. Good Neighbors integrates child protection into all thematic areas of programming and promotes protective environments in communities.
- **Child Sexual Abuse:** When a child is used by another person for sexual stimulation or gratification. It encompasses all forms of sexual act involving children, whether with or without direct physical contact (including exposing a child to online child sexual exploitation material, or taking sexually exploitative photos of children).
- **Child Trafficking:** Any act related, whether directly or indirectly, to the abduction, recruitment, transportation or reception of children for the purpose of exploitation, by means of threat, force, manipulation or other forms of coercion.
- **Child work:** An acceptable form of work for children, as it does not interfere with, but actually contributes to, their schooling, learning, recreation, physical/emotional well-being and overall development.
- **Commercial Sexual Exploitation of Children:** Sexual abuse perpetrated against the child by another person, involving remuneration in cash or kind to the child or to a third party.
- **Contact with Children:** A job, volunteer position or related task that involves or may involve contact with children, whether direct (including online) or indirect (e.g. use of children's pictures).
- **Grooming:** Behavior perpetrated by an offender to procure a child for sexual activity. The offender, for instance, may build a relationship of trust with the child, and then sexualize it. Examples are favoring a child, isolating them, giving undue attention or gifts, using sexualized language or inappropriate contact, or exposing the child to sexual concepts by means of online sexual exploitation material.
- **Military use of Children:** The exposure of children or their engagement in military / paramilitary activities, including as soldiers, suicide bombers or human shields.
- **Neglect:** The persistent failure or unwillingness to provide a child with safe drinking water, food, shelter, sanitation, supervision or care, resulting in risks to the child's health and development.
- **Online Child Sexual Exploitation:** All sexually exploitative acts perpetrated against a child and that have some connection to online operations. It

includes the use of Information and Communication Technologies (ICT) resulting in sexual exploitation, causing a child to be sexually exploited, or resulting in materials documenting such sexual exploitation to be produced, purchased, sold, owned, circulated or transmitted.

- **Online-Facilitated Child Sexual Abuse:** Sending an electronic message to a recipient who the sender believes to be under 18 years of age, 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 under 18 years of age.
- **Working with Children:** Being engaged in an activity where contact with children is expected as a normal, recurring or substantial component, rather than incidental. Working includes volunteering or other unpaid work.

## Annex B: All about GN Safeguarding Policy Leaflet



# All about GN Safeguarding Policy

### Why do we need safeguarding policy?



1. Report

4. Investigate

2. Assess

3. Support Survivor

Step

**"To prevent"**  
any risk or harm before it happens

**"To respond"**  
appropriately to any abuse or exploitation that has been reported

### What should we report?

Any suspicions, concerns and complaints regarding our staff members and partners committing sexual exploitation and abuse

or

Any other safeguarding violations through our programs, staff and partners.

### When should we report?

IMMEDIATELY!

Do not wait until you are sure that the allegation is true.

### Let's do it together!

to make our organization safer!

### Who do we safeguard?



Children



Vulnerable adults

### Who should comply with safeguarding policy?



GN Employees & Board Members



Partners

### REPORT!

Immediately or within 24 hours

To one of the below channels:

- Your Direct Supervisor
- Your Local Safeguarding Focal Point
- Your National Safeguarding Focal Point
- Safeguarding Hotline  
[safeguarding@goodneighbors.org](mailto:safeguarding@goodneighbors.org)

Safeguarding is everyone's responsibility





Take Safeguarding Training

Sign the pledge of compliance to GN safeguarding policy



Ensure all agreements with partners contain provisions under safeguarding policy



Fully understand GN code of conduct and safeguarding obligations



Assess potential risks prior to carrying out programs and ensure children and community members know how to raise their concerns



Address safeguarding in all process of recruitment through screening and identity and background checks



Put the safety, well-being and interest of survivors and victims first and support what they need



Ensure personal data about children or vulnerable adults is securely stored and protected



## GN Mission Statement & Commitment to Safeguarding

- ▶ Good Neighbors exists to make the world a place without hunger, where people live together in harmony.
- ▶ Good Neighbors respects the human rights of our neighbors suffering from poverty, disasters and oppression, and helps them to achieve self-reliance and enables them to rebuild hope.
- ▶ Good Neighbors takes a zero-tolerance approach towards any action that leads to the physical, sexual or psychological harm, violence, exploitation of those we work with.

### Dos

#### General principles

- Ensure that all GN employees and partners are fully aware of this policy and encourage them to report incidents of alleged or actual safeguarding violations.
- Maintain confidentiality throughout the reporting procedure.
- Comply with applicable data protection and privacy laws and digital child safeguarding protocols.
- Respect the right to personal privacy of everyone, including children and vulnerable adults.
- Be careful about language, behavior, and interactions with children and vulnerable adults.
- Avoid inappropriate conduct within a relationship of trust, especially in case of power differentials with children or vulnerable adults.

#### Rules during activities

- Encourage everyone, especially children and vulnerable adults, to talk about any concerns they may have and call into question unappreciated behaviors.
- In case of activities with children or vulnerable adults, involve two or more adults being present when possible, or at least ensure they are within sight and hearing of others.
- Manage children's behavior with appropriate, positive and non-violent methods.
- Enable children to freely express their opinion in relevant activities and settings.
- Set up separate sleeping accommodations for children.

*\*More Dos and Don'ts are provided in the GN Child and Adult Safeguarding Policy.*

### Don'ts

#### General principles

- DON'T hide, cover up or enable any known or alleged safeguarding incident or breach of the present Safeguarding Policy.
- DON'T discriminate against a child and vulnerable adult on any grounds (gender identity, religion, social status, race, nationality, disability, age, sexual preferences, and any other conditions or circumstances).
- DON'T abuse the trust of anyone, especially children and vulnerable adults.
- DON'T abuse their authority and power, acknowledging that children and vulnerable adults are the weakest parties in the relationship.
- DON'T exchange money, employment, goods, or services for sex (including sexual favors).
- DON'T engage in sexual activity or have a sexual relationship with any program participants of any age since such relationships are based on unequal power dynamics, regardless of the age of consent or local custom.
- DON'T consent to or condone child marriage or recruit children in any form of child labor.

#### Rules during activities

- DON'T create any circumstances or situations in which inappropriate relationship or behaviors with children and vulnerable adults may take place or be alleged.
- DON'T stay alone overnight, sleep in the same room or bed with children benefiting from Good Neighbors programs who are not part of their family.
- DON'T exchange personal contact information or ask for children's personal information, unless it is within the boundaries of professional activities and with consent from a parent or guardian.
- DON'T communicate with or take a photo of a child in a Good Neighbors project without parental or guardian consent, whether in-person or virtually.

**I acknowledge that I have read and understood Good Neighbors' mission statement, commitment to safeguarding and code of conduct. I agree to comply with them both during and outside working hours.**

Affiliation

Position

Name

Signature

Date: . . .