



**Self Help
AFRICA**

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Purpose** 
Beyond aid

Self Help Africa Child and Adult Safeguarding Policy

25 May 2023

DOCUMENT MANAGEMENT INFORMATION

Members:	<ul style="list-style-type: none"> • All board members/trustees, board committee/advisory board members and company members of each of Self Help Africa¹, United Purpose (UP) and their subsidiary companies, together with their country and liaison offices where they operate¹; • All employees, secondees, interns and volunteers at headquarters and in the country and liaison offices where they operate of SHA/UP and any of their subsidiary companies¹; • All consultants (including internal consultants with a SHA/UP and any of their subsidiary companies¹ email address) of SHA/UP and any of their subsidiary companies¹; • All contractors/suppliers/third parties under contract of SHA/UP and any of their subsidiary companies¹; • All partners (those entering into a partnership agreement or a sub-contract with SHA/UP and their subsidiary companies¹) of SHA/UP and any of their subsidiary companies¹; • All visitors (defined as all visitors to any SHA/UP¹ and their subsidiaries programming operations, namely those acting as representatives of donors and funding partner organisations (e.g. Universities, INGO's, corporates), guest visitors, and/or all people associated with SHA/UP and their subsidiaries¹ operations); and • All dependents of international staff placed in-country by SHA/UP and their subsidiary companies¹.
Title:	Child and Adult Safeguarding Policy
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Owned By:	Board of Directors, Senior Management Team, CEO
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Next review date:	31 May 2026
Associated policies:	This Child and Adult Safeguarding Policy is linked to and must be read in conjunction with the SHA Code of Conduct, Whistleblowing Policy, Conflict of Interest Policy, Email and Internet Use of Policy, Dignity at Work policies, Equality and Diversity Policy and the applicable Employee Handbook, Recruitment Policy.

ORGANISATIONAL VALUES

Values ² :	<p>IMPACT – We are accountable, ambitious and committed to systemic change.</p> <p>INNOVATION – We are agile, creative and enterprising in an ever changing world.</p> <p>COMMUNITY – We are inclusive, honest and have integrity in our relationships.</p>
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¹ Self Help Africa (SHA) is the trading name of Gorta CLG, and Self Help Africa (SHA) is a collective term and refers to Self Help Africa, Self Help Africa Inc., Self Help Africa UK, Self Help Africa NI, United Purpose, Concern Universal, Cumo Microfinance, Partner Africa, TruTrade, Village Aid or other entities, affiliated organisation, branches, and country/liaison offices that may form part of the group now and in the future.

² SHA Values are available at this link : <https://selfhelpafrica.org/ie/wp-content/uploads/sites/4/2023/03/Strategic-Objectives-Values-Behaviours-1.pdf>

DEFINITIONS

Abuse	Any action that intentionally harms or injures another person. In many cases, it is characterised by unbalanced power relationships between stakeholders (the abuser and the victim/survivor).
Child	Anyone under the age of 18 years regardless of local custom, or the age of majority or consent locally.
Disclosure	The term used for the information provided to alert SHA to an alleged incident and/or wrongdoing.
Domestic Abuse	Being subject to abuse perpetrated by carers, family and intimate partners.
Emotional Abuse	Psychological harm, bullying, manipulation, threatening, gaslighting and/ or actions that harm emotional wellbeing.
Exploitation	An umbrella term used to describe the abuse of children or adults who are forced, tricked, coerced or trafficked into exploitative activities for another's gain.
Harassment	An unwelcome behaviour of offensive nature severe or pervasive enough to create a work environment that a reasonable person would consider intimidating, hostile, or abusive. This includes discrimination based on gender, race, religion, sex (including pregnancy), ethnicity, age, disability or genetic information. It includes bullying, stalking, sexual harassment, personal harassment, and harassment based on any characteristics listed above.
Harm	Psychological, physical and any other infringement of an individual's rights.
Inappropriate Behaviour	Breach of SHA Code of Conduct set out in annex 5.
(SHA) Members	SHA Members include all individuals and entities as defined in the Document Management Information section of this document.
Neglect	Failure to meet basic needs of a Child or a Vulnerable Adult either by reckless or intentional actions. This includes being denied medication, food or water, and being prevented from care, self-care or hygiene.
Personal data	Is data relating to a living individual who can be identified from that data (or from that data and other information in our possession). Personal Data can be factual (such as a name, address or date of birth) or it can be an opinion (such as a performance appraisal). See the General Data Protection Regulation 2016/679 (GDPR). ³
Physical Abuse	Actions that lead to physical harm or injuries including potential physical harm. Examples are being punched, kicked, spat at, restrained, or being struck with objects.
(Abuse of) Power	Abuse of Power consists of improper behaviour by a someone with more power (or someone in a position of trust) to the detriment of a person in a junior or dependency role.
(Imbalance of) Power	An Imbalance of Power is having influence, authority, or control over people and/or resources.
Programme Participant	Any individual who stands to benefit <i>directly</i> from SHA development programming or humanitarian assistance. The term 'Programme Participant' is often used in preference to 'Beneficiary' as it is more empowering.
Protection from Sexual Exploitation and Abuse (PSEA)	The term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by staff or associated personnel. The term derives from the United Nations Secretary

³ See *What is Personal Data*, European Commission: https://commission.europa.eu/law/law-topic/data-protection/reform/what-personal-data_en

	General’s Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13).
Psychological Abuse	Referring to vulnerable people, being bullied, belittled/teased, being isolated or denied access to friends or family, harassment or controlling behaviour. See also Abuse; Emotional Abuse.
Safeguarding	The responsibility that the organisation has to ensure that all their Members ⁴ , operations, programmes and activities do no harm, particularly to children or vulnerable adults. That any suspicion the organisation has about the safety of people, particularly children and vulnerable people within the communities in which they work, are dealt with and reported to the appropriately.
Suspicion	Suspicion is when a concern or rumour is expressed about abuse or exploitation that may have taken place; or concern or rumour that abuse or exploitation may take place.
Sensitive data	Information about a person’s racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health or condition or sexual life, or biometric data e.g. fingerprints and facial recognition, and genetic data e.g. Chromosomal or DNA. Such information must only be obtained, used and/or processed under strict conditions in accordance with the EU General Data Protection Regulation 2016/679 (GDPR), and will usually require the express consent of the data subject concerned. ⁵
Sexual Abuse	Being forced to take part in or exposed to sexual activity or material, being photographed, filmed or observed for sexual purposes without their consent, by force or under unequal or coercive conditions, sexual touching, assault, and rape, this can occur without knowledge of the victim/survivor. It includes the inappropriate use of technology and social media; e.g., the storage or dissemination of pornography, the recording or sharing abusive images using technology such as via mobile phone texting, audio, video, images, podcasts, social networking websites and other multimedia or communications platforms.
Sexual Exploitation	Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes. This includes benefitting monetarily, socially, or politically from the sexual exploitation of another. This definition includes human trafficking and modern slavery.
Survivor	A person who has been abused or exploited. The term ‘survivor’ is often used in preference to ‘victim’ as it implies strength, resilience and the capacity to survive, however it is the individual’s choice how they wish to identify themselves.
Transactional Sexual Activity	This is the exchange of money, employment, goods, or services for sex or sexual/sexualised activity, including ‘sexual favours’. SHA does not make any judgement of those experience such transactions but recognises the inherent unequal power dynamic.
Trafficking in Persons	The recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.
Vulnerable Adult	Anyone over the age of 18 who, may be or is unable to protect or care for themselves by reason of a disability (of any kind), illness or age, those suffering from domestic abuse, trauma, addiction, or their immigration status. Vulnerability

⁴ “Members” include all individuals and entities as defined in the Document Management Information section of this document

⁵ See *Sensitive Data*, European Commission: https://commission.europa.eu/law/law-topic/data-protection/reform/rules-business-and-organisations/legal-grounds-processing-data/sensitive-data_en

	may be temporary. In some jurisdictions the term Adult at Risk is often used to describe a vulnerable person with a narrower definition than adopted by SHA.
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1. WHO MUST COMPLY WITH THIS POLICY?

- 1.1 Self Help Africa¹ (hereinafter, “SHA”) Child and Adult Safeguarding Policy is applicable to every Member as set out in the Document Management Information section of this document.
- 1.2 “SHA” includes all SHA entities, affiliated organisation, branches, and/or country/liason offices that may form part of the group now and in the future as set out at footnote 1 of this policy.
- 1.3 Those in positions of authority with SHA have a duty to act as positive role models in upholding the organisations standards, and to support and develop appropriate systems to maintain such environment. The SHA Child and Adult safeguarding Policy is integral to every contract, terms of reference or agreement that our organisation enters or is party to.

2. PURPOSE

- 2.1 This Child and Adult Safeguarding Policy has been developed in line with best practice and with reference to a number of sources including existing Self Help Africa policies and all applicable legislative standards. In addition, this policy is guided by key international principles and standards such as those set out in Annex 1.
- 2.2 The purpose of this policy is:
 - to protect people, particularly children and vulnerable adults;
 - to prevent children and vulnerable adults from harm, exploitation and abuse;
 - to ensure that the activities of SHA are implemented in a safe and protective environment as far as reasonably possible;
 - to set out the commitments made by SHA and inform all SHA Members of their responsibilities in relation to child and adult safeguarding;
 - to provide information and guidance on how to pro-actively identify, prevent, disclose, and manage actual and potential risk of harms, exploitation and abuse;
 - to ensure all SHA Members systems used to respond to safeguarding suspicions and/or disclosures are survivor-centred and protect those accused until proven guilty.
- 2.3 The Child and Adult Safeguarding Policy does not seek to replace existing associated policies (referenced above) but rather provides an umbrella, under which sit more specific policies, that cover the protection of all vulnerable populations, especially women and children, in one integrated policy.
- 2.4 As local laws and customs differ widely across the world, SHA’s Child and Adult Safeguarding Policy is informed by International Human Rights Law, United Nations’ standards, and best practice guidelines from the development and humanitarian sector (including SHA’s own policies and experience). It applies regardless of location and local law.

3. POLICY STATEMENT

- 3.1 SHA is committed to ensuring that anyone involved or in contact with our work, particularly children and vulnerable adults, are safe from harm. This policy encompasses measures to protect everyone who comes into contact with SHA, any of our work, including SHA Members.
- 3.2 SHA makes safeguarding those at risk of harm, exploitation and abuse our highest priority and takes

precedent over all other considerations without exception. Our duty includes acting where a suspicion relates to incidents that occurred some time ago. There is no time limit to our accountability to children or vulnerable adults.

- 3.3 This policy includes our approach to preventing all forms of harm, including but not limited to Preventing Sexual Abuse and Exploitation, Safeguarding Vulnerable Adults, Preventing Domestic Abuse and Safeguarding Children.
- 3.4 It is everyone's responsibility to create a safe environment for people who participate in our work, people with whom we work and SHA Members.
- 3.5 SHA recognises children may be subjected to multiple types of abuse: physical abuse, emotional abuse, neglect, sexual abuse and exploitation. Some adults may have additional vulnerabilities and may experience domestic abuse, emotional abuse, financial abuse, psychological abuse, sexual abuse, sexual exploitation, and sexual harassment.
- 3.6 It is the duty and the responsibility of all SHA Members to report any suspicions of inappropriate behaviour and breaches of this policy. While SHA Members are obligated to report any safeguarding suspicion, nothing in this policy should be read as compelling or requiring a survivor of abuse to disclose their own experiences of abuse or exploitation against their wishes.
- 3.7 We recognise that reporting can be challenging and difficult for those who have been subject to abuse, neglect or exploitation. SHA will seek to ensure that the reporting of safeguarding incidents is a process that should not create additional distress for survivors.
- 3.8 SHA commits to addressing safeguarding throughout its work, through the three pillars of **prevention, reporting** and **response**.

4. POLICY PRINCIPLES

- 4.1 SHA takes a zero-tolerance stance against any form of exploitation and abuse of people who participate in our operations, programmes or activities, people with whom we work, and SHA Members. Everyone, regardless of age, disability, gender, race, religious belief, sexual orientation, gender expression or identity and relationship status has the right to equal protection from all types of abuse and exploitation under this policy.
- 4.2 This policy upholds the values⁶ of the organisation and supports a culture that everyone who comes into contact with our work experiences respectful and non-discriminatory behaviour from each other, where harmful behaviour is not accepted, and power is not abused.
- 4.3 SHA recognises that some individuals, adults, and children, may be vulnerable and there is an additional requirement to support those who lack capacity, are disenfranchised or face additional barriers to their own safety and interests either through a mental, physical, circumstantial cause or due to their own experiences of being harmed or exploited. Vulnerability may occur for a variety of reasons and change over time.

5. ROLES & RESPONSIBILITIES

⁶ <https://selfhelpafrica.org/ie/wp-content/uploads/sites/4/2023/03/Strategic-Objectives-Values-Behaviours-1.pdf>

5.1 SHA will:

- a) Safeguard those who participate or work in our operations, programmes and activities from all forms of exploitation and abuse, and the appropriate provision of care and protection where abuse and exploitation are suspected.
- b) Engage with and inform everyone who participates or works in our operations, programmes or activities of the standards of behaviour they can expect from our SHA Members and how to raise suspicions.
- c) Thoroughly investigate all reports that this policy may have been breached and prioritise the best interests of survivors throughout our response.
- d) Ensure all those who participate in our operations, programmes and activities, and SHA Members are aware of our policy and our expectations on preventing and reporting of suspicions about abuse and/or exploitation as defined in this policy.
- e) Take robust appropriate action against SHA Members who engage any form of abuse and/or exploitation, or other breach of this policy as set out in the section 13 Non Compliance of this policy.
- f) Take robust action to prevent any perpetrators of abuse and/or exploitation from being engaged or re-engaged by SHA or any other organisation working with children and vulnerable adults. Including a commitment to procuring and providing accurate references, in line with the Inter-Agency Misconduct Disclosure Scheme, and reporting cases to statutory or appropriate law enforcement authorities, in accordance with the applicable laws.
- g) SHA will ensure ethical communications and has adopted the Dóchas Code of Conduct on Images and Messages⁷.

5.2 SHA will only work and affiliate with partners who:

- a) Share the same principles to prevent all forms of exploitation and abuse in their own policies, including clear obligations requiring all their Members⁴ to comply and report suspicions of breaches of such standards and an organisational commitment to act robustly when such reports are received.
- b) Agree in any partnership agreement, memorandum or contract that any failure of the partner to do all they can to prevent, report and respond appropriately to suspicions of abuse and exploitation as defined in this policy, shall constitute grounds to terminate the partnership.

6. STAFFING AND TRAINING

6.1 All SHA countries where SHA operates will have a designated Safeguarding Lead or Focal Point who will provide leadership in implementing this policy. They will report progress to their senior management team on a regular basis.

6.2 SHA Safeguarding Lead or Focal Point will be trained in handling sensitive issues arising from actual or perceived breach of the SHA Child and Adult Safeguarding Policy and associated policies.

6.3 All SHA employees, secondees, interns and volunteers, SHA consultants and SHA board members/trustees, and board committee/advisory board members must:

- a) Promptly complete the vetting, training and development requirements of their role in relation to Child and Adult Safeguarding, or repeat any requirement when required to do so.
- b) Declare any relevant suspicions made against themselves, or any civil and/or criminal charges or convictions received prior to or during their employment, appointment, engagement and/or contract.

⁷ <https://www.dochas.ie/resources/communications-pe/ethical-communications/>

6.4 The selection processes of all SHA Members, where applicable, must follow safe recruitment, procurement, partnership due diligence principles including, but not limited to, obtaining suitable references, providing evidence of identity and the successful completion of pre-employment/-appointment/-engagement/-contracting checks prior to joining, including the appropriate criminal record checks, where required.

6.5 All relevant SHA Members must renew (where appropriate) their criminal records check annually or when requested to.

6.6 Before an internal or external secondment or an internal promotion or change of role within SHA and SHA partners/sub-contractors, the existing line manager must certify the suitability of the individual to transfer and declare that there are no suspicions which have not been disclosed under this policy or where appropriate to the recruiting manager.

6.7 During the annual performance and development review process with employees, line managers or equivalent must demonstrate that they have discussed employees' reports or equivalent contribution to improve the safeguarding culture at SHA and/or relevant SHA Members.

6.8 All SHA employees, secondees, interns and volunteers, SHA consultants and SHA board members/trustees, and board committee/advisory board members must complete the required safeguarding training within 4 weeks of commencing their role. Failure to comply will result in the termination of employment, appointment, engagement and/or contract.

6.9 Refresher training must be completed by all SHA employees, secondees, interns and volunteers, SHA consultants and SHA board members/trustees, and board committee/advisory board members annually.

6.10 SHA partners/sub-contractors must have robust recruitment, management and training processes be in place equivalent as those set out in this section.

7. PREVENTIVE MEASURES

7.1 All SHA Members must:

- a) Ensure that all SHA operations, programmes and activities are carefully designed with the intention of maximising the safeguarding and welfare of everyone who may reasonably be expected to be involved or engaged in any way, including all employees, secondees, interns and volunteers and consultants of SHA, SHA partners/sub-contractors and/or SHA contractors/suppliers/third parties under contract.
- b) When planning or designing operations, programmes and/or any activity (in person or remotely) involving children and/or other Programme Participants, managers must work with the Safeguarding focal person in country to ensure that safeguarding risks are assessed and mitigated, it is managed appropriately and does not place anyone at risk of harm.
- c) Remember the position of trust which they occupy while in duty and/or involved in any manner in SHA operations, programmes and/or activities.
- d) Ensure that they always observe expected boundaries in their contact with people who participate in our activities, including when using social or digital media.
- e) Act in accordance with the SHA Code of Conduct at all times to ensure the welfare and safety of children and vulnerable adults are always prioritised.
- f) Ensure that their access to or use of SHA and/or SHA Members information systems does not expose people with whom we work with to risk of harm through a failure to secure and/or process Personal and Sensitive data⁸ in accordance with EU General Data Protection

⁸ *Personal and Sensitive data* are defined in the Definitions section of this document

Regulation 2016/679 (**GDPR**) or the misuse of technology itself such as accessing indecent or inappropriate material.

- g) Ensure that their engagement with other people is appropriate and never exploitative or take advantage in anyway of any power imbalances that exist.
- h) Ensure that they respect the privacy and dignity of others when using social media or sharing any images of SHA work, following appropriate consent procedures in accordance with EU General Data Protection Regulation 2016/679 (**GDPR**) and the Dóchas Code of Conduct on Images and Messages.
- i) Never share any images that would allow a child or vulnerable adult to be identified, the full name, location, and location should never be combined with the name or any other Personal data⁹ when sharing images.

7.2 Agreements with SHA partners and/or subcontractors:

- a) Any person who prepares and manages partnership agreements, memorandum or contracts between SHA and SHA partners/sub-contractors or other groups/individuals which bring their Members into contact with children or vulnerable adults (including their data or images) must ensure that the agreement, memorandum or contract includes an obligation on the SHA partner/sub-contractor or other groups/individuals to maintain robust and effective safeguarding standards and commitments, which accord with this policy.
- b) Where a SHA partner or sub-contractor does not have a policy and procedures that meet the standards in this policy, the SHA partner/sub-contractor will formally agree to implement the standards in this policy.
- c) All SHA partnership agreements, memorandums or contracts must include terms that allow termination of such agreement, memorandum or contract in the event the SHA partner/sub-contractor fails to do all they can to prevent, report and respond appropriately to suspicions of sexual exploitation and abuse.
- d) If there are any suspicions about any SHA partner and/or sub-contractor's compliance with or observance of any of the agreed safeguarding standards, the person responsible for setting up and/or managing the partnership and/or the sub-contract must immediately inform the SHA Country Director or equivalent and the SHA Global Safeguarding Lead.

7.3 Agreements with SHA contractors/suppliers/third parties under contract:

- a) SHA Contractors/suppliers/third parties under contract engaged in situations where they or their employees or subcontractors may have access to children or vulnerable adults in SHA operations, programmes and/or activities, or may have access to Personal data⁸ about such children or vulnerable adults, require specific safeguarding clause in their contracts with SHA. These requirements apply whether the contractor/supplier/third party under contract is being paid for the services or is providing them for free (pro bono), and is irrespective of the duration of the contract.

8. REPORTING

8.1 All SHA Members must:

- a) Report and share any information of any suspicion of any of form of abuse and/or exploitation of those who participate in our operations, programmes and activities, and/or of any SHA Members. SHA Members must be aware that withholding information which relates to someone being abused and/or exploited, could prevent prompt and necessary protection, and care for those who have or may be harmed. Withholding information or mishandling suspicions is treated as non-compliance as set out the section 13 Non Compliance of this policy.
- b) The duty to report and share information includes suspicions related to incidents that might have occurred in the past, however long ago or suspicions where the identity or location of those involved is unknown.

⁹ https://commission.europa.eu/law/law-topic/data-protection/reform/what-personal-data_en

8.2 In any event, SHA Members must report immediately any safeguarding suspicions about those who participate in our operations, programmes and activities, and/or about any SHA Members to their:

- SHA Safeguarding Lead or Focal Point or line manager; if the SHA Member does not feel comfortable reporting to SHA Safeguarding Lead or Focal Point or line manager (for example if they feel that the report will not be taken seriously or if that person is implicated in the suspicion), they may report to
 - Any appropriate SHA employee. For example, this could be a SHA senior manager or a member of the HR team or
 - SHA headquarters, emailing: confidential.reporting@selfhelpafrica.org, or contacting SHA headquarters dedicated phone **+353 89 207 35 58** (WhatsApp and SMS) or
 - or SHA's externally managed hotline, **Ethicspoint: <http://selfhelpafrica.ethicspoint.com>**, or
 - SHA Global Safeguarding Lead.

8.3 SHA understands and recognises that the decision to report a suspicion can be difficult or potentially unsafe. We will support those who raised suspicions and will not tolerate any form of harm, retaliation, threats or penalisation of those doing so, regardless of the outcome of any concern or investigation. Those reporting legitimate suspicions will not suffer any prejudice in respect of their engagement, opportunity, training, promotion, or employment.

8.4 Without exception, all suspicions for the welfare of children or vulnerable adults in member countries of the European Economic Area, Australia, Canada, New Zealand, The Republic of Ireland, The United States, and the United Kingdom will be reported to the relevant agency. Suspicions in other jurisdictions will also be reported, unless to do so would place people at an unacceptable risk of additional harm.

8.5 Any decision not to make a report to the relevant agency will be subject to a documented risk assessment and approved in writing by the SHA Chief Executive Officer (CEO).

8.6 SHA and all Safeguarding Focal Points or Leads must ensure that SHA and/or their own reporting channels for Safeguarding are displayed in the local or national language in an accessible manner, in all SHA and SHA Members offices and any other relevant premises. Such posters must contain the contacts of all Safeguarding Focal Points or Leads, the SHA and/or SHA Members internal and external whistleblowing channels and the contact of the SHA Global Safeguarding Lead.

9. RESPONSE

9.1 All SHA Members must not:

- a) Agree, assist, or negotiate any form of settlement between a survivor of abuse or exploitation (or their family/community) and an alleged perpetrator. Suspected or actual incidents must be immediately reported in accordance with this policy.
- b) Fail, delay, or obstruct the reporting of any safeguarding suspicion in accordance with this policy; the absence of evidence or inability to identify a survivor or alleged perpetrator is not reasonable grounds to delay or fail to report any suspicions about exploitation or abuse.

9.2 Survivors have the right to decide whether they wish to be involved in any investigation. Where an individual decides not to participate, SHA will assess the situation and consider whether an investigation should be undertaken.

9.4 Regardless of whether or not a survivor chooses to be involved in an investigation, SHA will offer support to access counselling and medical services.

9.5 All SHA Members must be aware that any suspicions of abuse or exploitation of children or vulnerable adults made against them will receive a thorough and robust response:

- a) By consideration of referral to law enforcement authorities for criminal investigation, where appropriate to do so,
- b) By consulting with the relevant statutory or government agency,
- c) By an investigation, in accordance with this policy and (if relevant) disciplinary actions, removal or termination of a contractual relationship (as relevant),¹⁰
- d) SHA will comply with its legal obligations to refer individuals to the relevant barring authorities should there be evidence that an individual has harmed a child, adult or people with whom we work or place a child, adult or people with whom we work at risk of harm.

Such measures will also apply to any SHA Member which has agreed SHA safeguarding standards in this policy.

9.6 The SHA Risk and Compliance Manager, supported by the SHA Global Safeguarding Lead, will commission and oversee all investigations into suspicions of inappropriate behaviour and breaches of this policy in a survivor centred manner. Investigations into suspicions that the SHA Risk and Compliance Manager and/or Global Safeguarding Lead have breached this policy, will be commissioned by SHA Finance Director.

9.7 Investigations, whether internal or external, must not be commissioned unless proper agreement has been obtained from the SHA Risk and Compliance Manager and/or any relevant statutory body and/or the police where necessary. The SHA Risk and Compliance Manager will ensure that suitably trained investigators are available to conduct any safeguarding investigation.

9.8 Where a SHA Member, whether employed or otherwise, gives notice or terminates the agreement, memorandum and/or contract prior to the commencement or completion of a safeguarding investigation and any subsequent process, SHA will continue as per this policy, and a clear investigation outcome recorded.

9.9 Where appropriate, SHA will report safeguarding suspicions to the relevant regulators and meet obligations to report incidents to donors.

10. CONFIDENTIALITY

10.1 It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding suspicions. Information relating to the suspicions and subsequent case management should be shared on a need-to-know basis only and should always be kept secure.

11. RISK MANAGEMENT

11.1 SHA will audit its operations to ensure that this Child and Adult Safeguarding Policy is being addressed correctly in 4 components:

- a) Policy: the Child and Adult Safeguarding Policy is applied in all country programmes, it is easily accessible to all staff and fully understood by all Members.
- b) Procedures: systems are in place to reduce risks of abuse or exploitation, rumours and the possibility of harm.
- c) People: staff are recruited, managed and work in an environment that addresses safeguarding through support, training, information and response.
- d) Accountability: systems are in place to receive and respond to suspicions, and to recognize and limit risks.

¹⁰ Should a referral to statutory agencies be inappropriate, internal action may be recommended by the statutory agency concerned or at the conclusion of an investigation by a statutory agency.

12. COMMUNITY FEED-BACK AND RESPONSE MECHANISM

12.1 SHA will:

- a) Ensure that children, parents and other adults are aware of established feed-back and response mechanisms in SHA operations, programmes and activities and their right to be safe from abuse and exploitation in SHA's operations, programmes and activities.
- b) Ensure that anyone, including parents and children, participating in any SHA operations, programme and activity is made meaningfully aware of the behaviour they should expect from SHA Members and how to raise suspicions or report general suggestions.
- c) Meaningfully engage children in the planning and design of operations, programmes and activities that will involve children.

13. NON COMPLIANCE

13.1 Any suspicion regarding inappropriate behaviour and breaches of the Child and Adult Safeguarding Policy, at any level is treated with the utmost seriousness by SHA. SHA will take immediate action appropriate to the circumstances and will address the support needs of those involved. In the event of a suspicions that involves a criminal offence, the subject of complaint should be informed that, in addition to disciplinary action, the investigation may be reported to the appropriate legal authorities for further investigation.

13.2 Non-compliance in relation to any standards and commitments set out in this SHA Child and Adult Safeguarding Policy and/or SHA Code of Conduct may result in disciplinary action, up to and including dismissal, removal or termination of a contractual relationship (as relevant) and may lead to civil and/or criminal prosecution. SHA will refer cases to law enforcement authorities where appropriate.

13.3 With regards breach by a SHA partner or sub-contractor of this policy, appropriate action will be taken up to and including immediate termination of a partnership agreement, memorandum and/or contract. In this case, the short or long- term impact on Programme Participants of the termination of a partnership will be considered.

13.4 SHA also recognises the significant damage that can be caused by malicious or unfounded accusations and will endeavour to provide protection for SHA employees, secondees, interns and volunteers, board members/trustees, board committee/advisory board members and company members who may be wrongly accused.

ANNEX 1: Safeguarding key international principles and standards

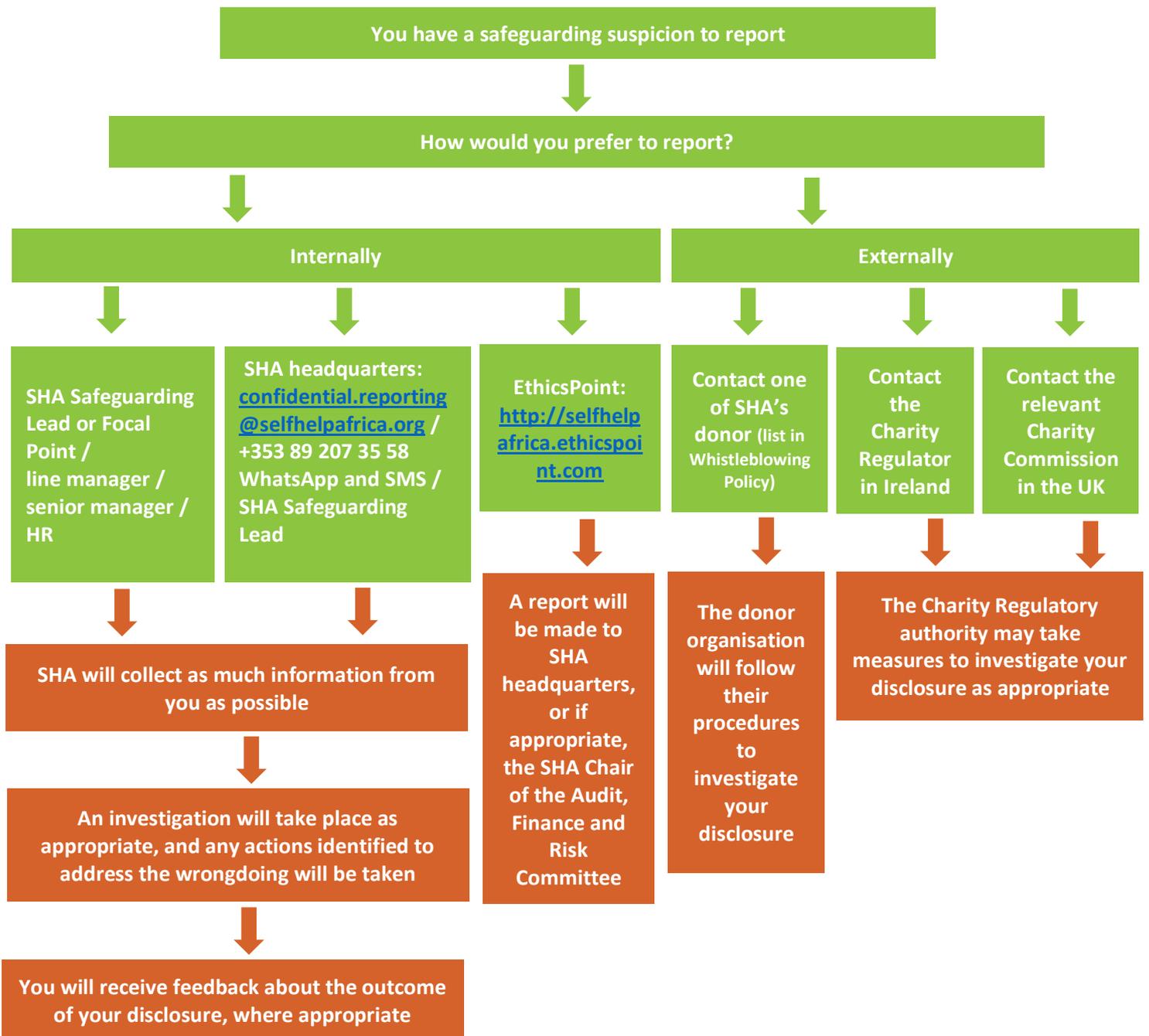
SHA Child and Adult Safeguarding policy is guided by a number of key international principles and standards as set out in

- the Universal Declaration of Human Rights (UDHR);
- the UN Convention of the Rights of the Child (UNCRC, 1989);
- the UN Convention for the Elimination of all forms of Discrimination against Women (CEDAW, 1979).

The policy has been developed in accordance with the six core principles adopted in 2002 by the Inter-Agency Standing Committee Task Force on Prevention and Response to Sexual Exploitation and Abuse (2002),⁴ and the principles of the United Nations Secretary- General's Bulletin on special measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13).⁵

The SHA Child and Adult Policy is also in line with the IASC Minimum Operating Standards; Protection from Sexual Exploitation and Abuse by own Personnel (2019).

ANNEX 2: Flow chart of reporting safeguarding suspicions



ANNEX 3: Names and contact details of Safeguarding focal points
(Salesforce link)

ANNEX 4: Initial Safeguarding Incident Report

When dealing with any complaint of a **Category 5 – and Category 6 – Safeguarding** nature; always treat the case with the utmost confidentiality.

To be submitted to confidential.reporting@selfhelpafrica.org within 24 hours of becoming aware of a safeguarding incident or suspicion.

SHA Head Office will determine whether the reported safeguarding incident or suspicion pertains to Category 5 – Safeguarding, or 6 – Safeguarding. Category 5 – Safeguarding investigations may be managed by the country programme only with the SHA Head Office prior approval and all category 6 investigations would need to be handled by SHA Head Office.

Acknowledgement will come from the Risk and Compliance Manager, or a delegated person, after which the Risk and Compliance Manager, or the delegated person, will consult and communicate regarding further actions.

a) Name, title and job location of person submitting this report:

b) Date this report was submitted:

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DETAILS OF THE SAFEGUARDING INCIDENT

1. Name of person who first received the alleged or actual safeguarding incident report.

2. Is this being reported within 24 hours of being informed? If not, explain why.

3. On what date has the alleged incident occurred (approximate date / period if exact date not known?)

4. Where has this alleged incident occurred?

5. Preliminary details of the safeguarding incident/s:

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6. Please provide the following details:

If known, please provide alleged Victim(s)/Survivor(s) Details

Name(s):	
Gender(s):	
Age(s):	
SHA Member('s) (Yes/No):	
Relationship to SHA e.g. programme participant, employee, consultant, supplier etc.	
Role(s) and/or Occupation(s):	
Current Location(s):	
Has emergency medical intervention been provided? (If so, please give details – Who, What, When)	
Relationship to the Alleged Subject of Complaint?	

If known, please provide alleged Subject of Complaint(s) (SOC) Details

Name(s):	
Gender(s):	
Age(s):	
SHA Employee('s) (Yes/No):	
Role(s) and/or Occupation(s):	
Current Location(s):	

7. Details of all parties who are aware of the safeguarding incident/s, suspected or otherwise to date.

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8. Copies of supporting documentation available at initial reporting stage.

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9. Confirm whether any actions have been taken.

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10. Detail any security implications.

11. Proposed actions to be taken, for approval by the Risk and Compliance Manager, or the delegated person.

12. In cases involving laptops, mobile phones or other data storage devices please consider any data protection implications?

13. Do circumstances exist where this complaint should be reported to Law Enforcement?

14. What is the name of the relevant Donor?

15. Has this incident been reported to the relevant Donor?

16. What SHA programme does this alleged incident relate to? (provide Programme reference, or e.g. WASH, Food Security etc.)

17. Please include any other information you deem relevant to the case.

Note: If you do not receive direction from Risk and Compliance Manager, or the delegated person, within 36 hours, you should proceed with the measures you deem necessary to prevent further harm.

Timeline for anticipated acknowledgment / response:

After you have submitted this report to confidential.reporting@selfhelpafrica.org you may anticipate an acknowledgement e-mail from the Risk and Compliance Manager, or a delegated person, within 36 hours. This is to recognise receipt of your submission and will inform you that discussions will take place at SHA Head Office regarding this case. Within 36 hours of your submitting this report, the Risk and Compliance Manager or the delegated person, will make contact with you with more considerable and instructive feedback. If the Risk and Compliance Manager, or the delegated person, feels that an investigation is necessary by your country team; they will indicate so and ask you to complete an Investigation Plan. The Risk and Compliance Manager, or the delegated person, will also be available to offer advice on all aspects of the investigation.

ANNEX 5: Self Help Africa Code of Conduct

ANNEX 6: SHA Child and Adult Safeguarding Certification

- a) I hereby certify that I am aware of my obligation to comply with SHA Child and Adult Safeguarding Policy and the SHA associated policies:
- Code of Conduct
 - Whistleblowing Policy
 - Conflict of Interest Policy
 - Email and Internet Use of Policy
 - Dignity at Work policies,
 - Equality and Diversity Policy,
 - the applicable Employee Handbook
 - Recruitment Policy.
- b) I further certify that I commit to disclosing any suspicion of inappropriate behaviour and/or breach related to this Child and Adult Safeguarding Policy and the associated SHA policies, through the mechanisms outlined above or in SHA’s Whistleblowing Policy. I understand that SHA is committed to treating any such disclosure in a confidential and anonymous way with no risk of retaliation.
- c) I also certify that I am aware of the consequences of non-compliance with this Child and Adult Safeguarding Policy and the associated policies which will include immediate disciplinary action, up to and including dismissal, removal or termination of a contractual relationship (as relevant), and/or civil and/or criminal prosecution where relevant.

By signing below, I confirm that I have read, agree with, and will adhere to the Code and above certifications.

Name (block letters): _____

Signature: _____

Position/relationship to SHA: _____

Date: _____