

Good Neighbours UK

Child and Adult Safeguarding Policy

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UK Email for reporting concerns

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I. Purpose

Good Neighbours exists to make the world a place without hunger, where people live together in harmony. Good Neighbours respects the human rights of the most vulnerable regardless of age, gender, culture, ethnicity, disability and religion and helps them live in self-reliance.

In alignment with our mission, Good Neighbours believes that all people's human rights should be respected, and we recognize that we have a responsibility to protect their rights and to prevent any form of harm. Therefore, Good Neighbours has zero-tolerance towards any action that leads to the physical, sexual and/or psychological harm, violence, exploitation of those we work with as we uphold the best interests of the community as our primary consideration.

This policy outlines Good Neighbours commitment to safeguarding, emphasizing protection from sexual exploitation and abuse (PSEA) and expands on the Good Neighbours Child Protection Policy that has been in place since 2013.

The purpose of this policy is to:

1. Ensure that Good Neighbours continues to protect people from risk or actual harm including neglect, sexual exploitation and abuse, physical abuse, and emotional abuse especially for children (any person under the age of 18), women and vulnerable adults.
2. Document how people can raise safeguarding concerns safely.
3. Outline Good Neighbours procedures including responsibilities, prevention, reporting, responding and training to promote awareness of safeguarding obligations.

II. Scope

This policy applies to all Good Neighbours employees in all GN partnership countries, global offices, affiliated organisations and partners. This policy applies during working hours and also outside of working hours to ensure zero tolerance towards incidents of violence, sexual exploitation and abuse by GN employees, partners, programming or operations.

III. Principles

Zero-tolerance

Good Neighbours takes a zero-tolerance approach to any forms of harm, abuse and exploitation regardless of its gravity. Abuse or exploitation manifests itself when there is an imbalance of power. This perceived power imbalance should not be used to advantage or to cause any harm. We also recognize that Sexual Exploitation and Abuse (SEA) is more likely to occur where there are inequalities particularly those experienced by children, women, vulnerable adults and on the grounds of ethnicity, gender, age, religion and disability. This form of discrimination will not be tolerated. We are committed to holding whoever misuses their authority and causes harm to vulnerable populations to account.

Shared responsibility and accountability

Good Neighbours believe safeguarding is everyone's responsibility. We will ensure that all those affiliated with Good Neighbours – all of our employees, board members and partners – understand their responsibility of upholding the safeguarding principles and procedures. Everyone involved with GN's work is accountable for being alert to any possibility of abuse of power or exploitation around them both during and outside working hours and identifying and reporting any witnessed or known violations in accordance with our safeguarding systems. We

are also fully aware of our commitment to helping partners meet the minimum requirement of safeguarding.

Do no harm

Good Neighbours makes sure that we do no harm to all children and vulnerable adults in every aspect of all our programming and organizational operations. We will do our utmost to minimize any safeguarding risks by carrying out risk assessments on all projects, and reflect suggestions made by community members.

Best interests of children and vulnerable adults

Good Neighbours keeps the best interests of children and vulnerable adults as the top priority when enacting policies and operating our programs. We believe that everyone has a right to live their lives free from sexual abuse, exploitation and harassment, and that no one should be subjected to abuse in any form. To make sure their rights and best interests fully realized, we will enable children and vulnerable adults to make informed decisions as active participants in our work. Particularly, the best interests of the child shall be a key consideration so that children make their own choices and know how their decisions will affect their lives.

Confidentiality

Good Neighbours UK commits to keeping all sensitive information and/or documents pertaining to an investigation confidential. Information will only be made available to those conducting the investigation. To prevent information leakage to external stakeholders, we shall ensure that emails or documents containing sensitive information should be approved by safeguarding focal point(s) prior to sending.

Survivor-centered approach

Good Neighbours UK is committed to listening to survivors by acting on their recommendations with dignity and respect. Support for the survivors is a priority, with their privacy being maintained. We also commit to creating an environment where survivors feel safe to engage, and that their engagement will not harm them. It is a core belief of Good Neighbours to help create sustainable communities where survivors and individuals have a voice; that they have the resources to organize themselves and are able to make their own decisions, enabling them to stay safe and protect each other.

Safe environment and organizational culture

In every aspect of our work, our commitment is to cultivate a safe environment and be respectful. We will share this culture with all of those we serve including our employees and partners. Any forms of bad behavior, misconduct and violations of this policy will not be tolerated. Our safeguarding focal points and senior leadership, in all GN global offices and partnership countries,

shall spread best safeguarding practices, listen to feedback, and encourage continuous learning to improve this policy and support its wider implementation. We will also ensure that safeguarding issues within Good Neighbours UK are transparently shared and discussed in order to prevent any poor practices. Furthermore, Good Neighbours is committed to the continuous improvement of its safeguarding efforts by learning through its management processes, community engagement and the monitoring of best practice.

Risk management approach¹

Good Neighbours takes a risk-based approach when developing and delivering all of its programs and activities. Safeguarding risks are identified, monitored, mitigated and regularly reviewed and owned - with clear lines of responsibility and accountability to the most senior level.

IV. Main definitions²

- **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 Neighbours 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 Neighbours is a safe organization.
- **Child:** Any person under the age of eighteen (18) years as per the 1989 Convention on the Rights of the Child (CRC).
- **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.
- **Survivor:** A person who has allegedly been subject of harassment, abuse or exploitation, whether of a sexual or any other nature.
- **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

¹ The Good Neighbours risk management framework is set out in the Good Neighbours Administrative Guideline

² This section contains only the main definitions in a summarized form. For a full list, please consult the *Annex 1. Full Definitions*.

immediately give medical treatment to an injured child resulting in serious impairment of their growth and development or in their permanent incapacity or death.

- **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 and 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.
- **Global Offices:** Global Offices specialize in the global support and coordination of partnership countries in line with the Good Neighbours' global management structure. They also develop policies and strategies, provide management support, facilitate capacity-building, operate programs and build networks and partnerships. Global Offices consist of Global Partnership Center (GPC), Global Capacity Development Center (GCDC), Good Neighbours Global Impact Foundation (GIF), Geneva International Cooperation Office, and Regional Coordination Offices.
- **Partnership Countries:** GN partnership countries are those who are obliged with partnership covenant with GPC and include both field countries and support countries involved in implementing Good Neighbours projects, advocacy and campaigns around the globe. Countries in which Good Neighbours carry out country programs/projects and/or humanitarian responses in partnership with various stakeholders are called "field countries". Countries in which Good Neighbours raise awareness and funding for programming or operations through advocacy and campaigns are called "support countries."
- **Good Neighbours Board Members & Employees:** all board members and employees of Good Neighbours partnership countries, global offices and affiliated organizations.
- **Partners:** individuals or organizations including contractors, interns, volunteers, consultants, contracted specialists, researchers, visitors, community workers, suppliers and others who contribute to our work.

V. Dos and Don'ts

All Good Neighbours employees and partners **DO** and **MUST**:

1. 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 both internal and external safeguarding investigations and provide all necessary information to applicable local authorities if needed;
- Comply with applicable data protection and privacy laws and digital child safeguarding protocols.
- Inform their supervisor of their whereabouts and activities;
- 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.

2. 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;

All Good Neighbours employees and partners **DON'T** and **MUST NOT**:

1. 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 rely on their name, reputation, power, position or standing to get away with misconduct;
- DON'T abuse their authority and power, acknowledging that children and vulnerable adults are the weakest parties in the relationship;
- DON'T consume alcohol or narcotics during office hours or in a way that may affect their work, with the exception of prescription drugs.
- DON'T exploit nor abuse, nor place at risk of being so, children and vulnerable adults neither sexually, economically, nor in any other way;
- 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 permit abusive peer activities, e.g. initiation ceremonies, bullying, etc., nor unsafe or illegal behavior;
- DON'T physically assault or threaten any other person, especially children and vulnerable adults, not even if it is for disciplinary reasons;
- DON'T behave exploitatively and talk inappropriately or violently so that it may damage emotions of children or vulnerable adults, such as insulting or disregarding their dignity;
- DON'T expose children to inappropriate images, films, music and websites including mature content, indecent images (pornography) and violence;
- DON'T consent to or condone child marriage or any sexual relations among an adult and a child;
- DON'T recruit children in any form of child labor (defined as work that is mentally, physically, socially or morally dangerous and harmful to children, or that interferes with their schooling, including housework).

2. 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 make provocative or misguided remarks or threats to a child or vulnerable adults, even if joking;
- DON'T get drawn into inappropriate attention-seeking behavior on the part of children, e.g. tantrums and crushes;
- DON'T use improper language on any channel of communication;
- DON'T stay alone overnight, sleep in the same room or bed with children benefiting from Good Neighbours programs who are not part of their family;
- DON'T invite children to stay overnight in any type of accommodation with the exception of officially approved events only with parental or guardian consent as well as one's supervisor's approval;
- 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 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.);
- DON'T ask to meet children away from other adults or spend excessive time alone from others in a manner which could be interpreted as inappropriate;
- DON'T take a child alone in a vehicle, unless it is absolutely necessary, and only with parental or guardian consent as well as one's supervisor's approval;
- DON'T misuse or are careless with personal data about people we work with;
- DON'T communicate with or take a photo of a child in a Good Neighbours project without parental or guardian consent, whether in-person or virtually.

Breaches of the abovementioned 'Dos and Don'ts' will be treated as a serious issue and may result in disciplinary action including termination.

VI. Responsibilities

- **All Good Neighbours Employees and Partners:** any individual who is working or contributing to the work of Good Neighbours 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.
- **Good Neighbours Global Partnership Center (GPC) Board Members (Global Senior Management):** All GPC Board Members bear the overall responsibility and accountability for the global implementation of this policy
- **Good Neighbours Board of Directors and Steering Committee Members:** Board of Directors and Steering Committee members of all global offices, partnership countries and affiliated organizations 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
- **Good Neighbours Secretary Generals and Representatives:** Secretary Generals and Representatives of all global offices, partnership countries, and affiliated organizations are 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.
- **National and Local Safeguarding Focal Points:** Every GN partnership country and global office should establish and maintain National/Local Safeguarding Focal Points. 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. (*refer to 'VIII. Reporting'*)

and 'IX. Responding' for more specific responsibilities of national and local safeguarding focal points)

- **Global Safeguarding Focal Point and Regional Coordinators:** 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. Regional Coordinators are responsible for receiving reports from field countries and overseeing the implementation of this policy in their region.

VII. Prevention

1. Safe recruitment

1.1 Screening

To only recruit employees who are suitable for working with children and vulnerable adults in accordance with safeguarding principles, Good Neighbours will address safeguarding in all processes of recruitment including job advertisements, applications, interviews, obtaining references and conducting identity and background checks. It applies to all candidates for employment, governing body members, volunteers, interns, contractors and partners who will work together with Good Neighbours.

- Job advertisements and applications will indicate safeguarding principles to discourage individuals from applying for positions who pose an unacceptable risk to children and vulnerable adults.
- During the interview process, questions about previous work with children and vulnerable adults should be addressed.
- During the reference checks, questions concerning the suitability of the candidate to work with children and vulnerable adults should be asked.
- References should be obtained from at least two persons. Documentation of references should be kept in file.
- The newly hired employees should sign the pledge on compliance to the GN safeguarding policy. (*Annex 2*)

1.2 Identity and Background Checks

To screen out who has past records indicating an unacceptable risk of harm on children and vulnerable adults, Good Neighbours will conduct appropriate identity and background checks on the employment of all employees, interns, volunteers, consultants and members of the governing body as it is considered appropriate for the context and permitted by law.

- The following must be carried out prior to employment or engagement with Good Neighbours:
 - All employees and partners employed (including interns, consultants) should submit the background check verification form (*annex 3*).
 - All employees and partners, who come into direct contact with children and vulnerable adults, should have a comprehensive background record check (BRC) issued by the police/local authorities.
- These documents must be reviewed and kept on file by the HR manager (or equivalent) in every GN global office or partnership country and verified by the representatives.
- Persons with a record of any crime against children or sexual exploitation or abuse against an adult must not be hired or engaged by Good Neighbours, to the extent permitted by applicable law.

2. Training

2.1 Mandatory safeguarding training

Good Neighbours will provide mandatory safeguarding training to all employees and partners to ensure that they are aware, accessible to, familiar with, and know their responsibilities within this policy.

- The safeguarding training will be provided at induction and then regularly provide refresher training at least once every two years.
- The training will highlight safeguarding principles and prevention measures as well as including information about reporting and investigation procedures.
- The training aims to familiarize employees and partners about policy and procedures, raise awareness about safeguarding and to shape the organization's culture.

2.2 Visitors orientation

Good Neighbours will ensure all visitors (members, donors, invited guests, journalists, researchers, celebrities, etc.) receive a brief orientation on the safeguarding policy.

- All visitors must receive verbal orientation on the policy and sign the acknowledgement form (*Annex 5*) that they agree to comply with the policy prior to their direct engagement with children and vulnerable adults or their data. The signed acknowledgement form will be kept by the hosting field country.

3. Working with partner organizations

Good Neighbours will ensure all agreements with partner organizations contain provisions under the safeguarding policy. The agreement should indicate the partner organizations' commitment to safeguarding either by the partner organization agreeing to comply with this policy or submitting the partner organization's own safeguarding policy to Good Neighbours. The submitted policy from the partner organization should be reviewed and approved by Good Neighbours.

In case the partner organization agrees to comply with the Good Neighbours Safeguarding policy, the acknowledgement form (*Annex 5*) must be attached in the agreement.

During the agreement period, the partner organization is responsible for:

- reporting any alleged or known violations of this policy to Good Neighbours.
- undertaking a safe recruitment process, including having all personnel working in the GN project clear background record checks (BRC).
- conducting a risk assessment to ensure safe programming.
- providing training to all their associated staff about safeguarding and the policy.

VIII. Reporting

All GN employees and partners are responsible for knowing how to raise a concern, and to who, on a suspicion of misconduct in accordance with this policy. Failure to report any violations of this policy will be treated as a serious issue and may result in disciplinary procedures.

Anyone who has witnessed, alleged or known violations to this policy must report the concern to one of the below channels **immediately or within 24 hours** either verbally or in writing. (*Safeguarding Incident Reporting Form can be found in Annex 6*)

- 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 (if the above options are unavailable or confidentiality is preferred)

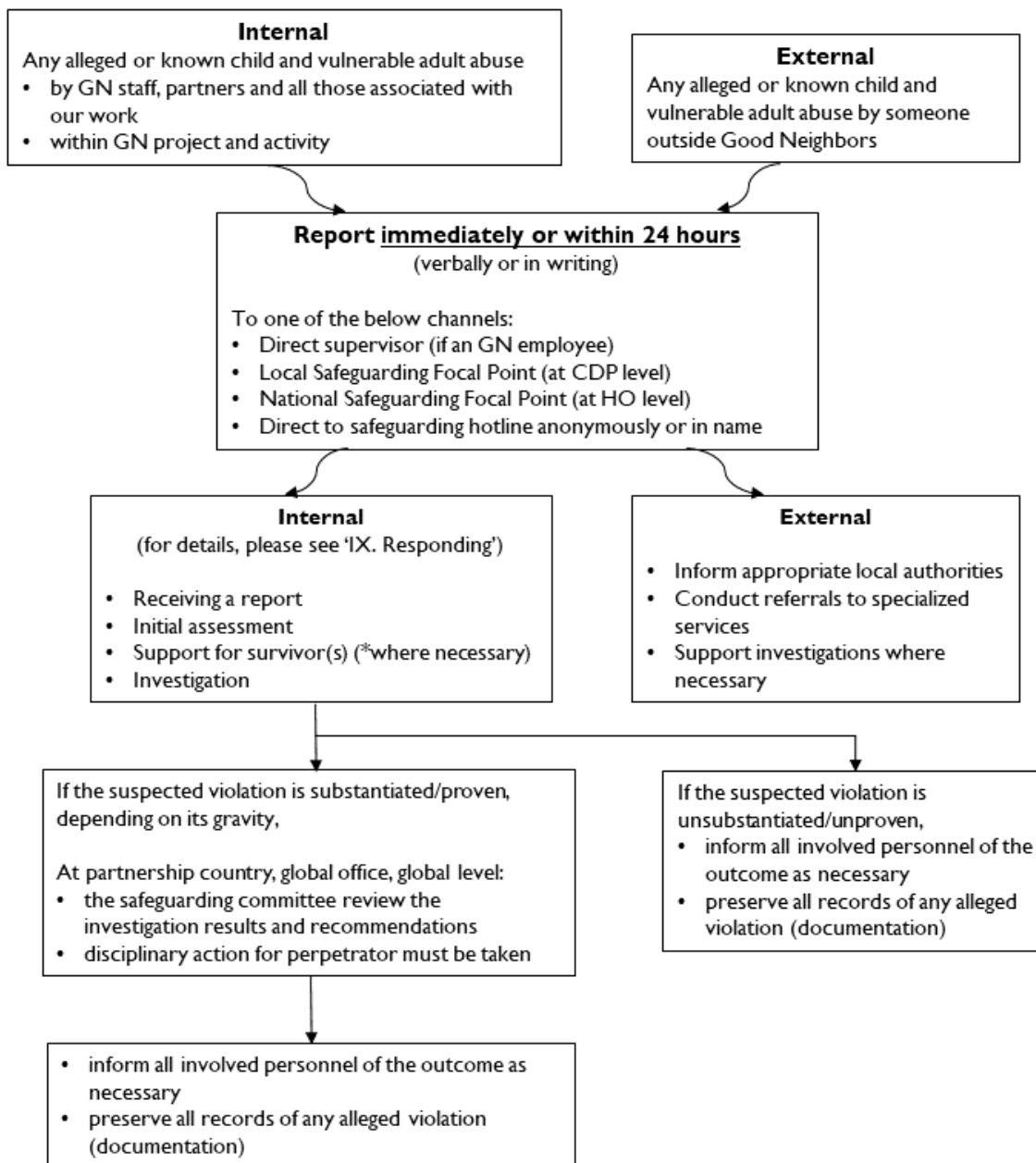
Regardless of personal opinion or no matter how serious the incident is, all GN employees and partners should report any suspicions and concerns as soon as possible, even if they are not sure if the allegation is true or do not think they have enough evidence to report.

Good Neighbours will not tolerate any attempts or actual retaliatory actions against survivors or whistleblowers/reporters.

If a GN employee who made an allegation that s/he knew to be false or is found to be with malicious intent will be subject to disciplinary action being taken, including termination of employment. If partners who work with and for us, action may result in termination of their relationship with Good Neighbours.

Good Neighbours makes available the contact information of all safeguarding focal points in each GN global office and partnership country. In order to facilitate the swift and effective reporting of abuse and exploitation in any form including SEA, national and global hotline (telephone number or email address) are made available to the public in general through its global website.

Good Neighbors Safeguarding Reporting and Responding Flowchart



IX. Responding

1. Investigation and procedures for handling allegations

1.1 Receiving a report

If any direct supervisor or Local Safeguarding Focal Point becomes the first point of contact for the report, they must file and report it immediately to the National Safeguarding Focal Point. Then, the National Safeguarding Focal Point should report every allegation to the Global Safeguarding Focal Point (GPC) and the Regional Coordinator (if a field country). All reports of suspicions or violations must be submitted to the Global Safeguarding Focal Point (GPC) regardless of its severity.

National Safeguarding Focal Points shall evaluate whether received safeguarding concerns are reportable to local authorities. They inform appropriate local authorities, if necessary, unless a report is likely to cause any further harm to a survivor.

1.2 Initial assessment

Once the allegation is reported to the Global Safeguarding Focal Point, the National Safeguarding Focal Point carries out initial assessment and information gathering of the incident (in consultation with the Local Safeguarding Focal Point, when necessary)

After initial screening or assessment is conducted, the National Safeguarding Focal Point makes sure that an alleged perpetrator is suspended from his/her duty pending the outcome of the investigation and that the alleged perpetrator cannot have any contact with a survivor.

Based upon the initial assessment results, if the reported allegation represents a breach of the GN Safeguarding policy, the National Safeguarding Focal Points will forward the case for investigation. If not a breach but potentially contains a safeguarding risk, appropriate actions should be followed such as reporting to local authorities, strengthening risk management practices and training.

Most of low severity level incidents will be an HR issue in the first instance which does not require escalation to be handled at global level. These cases need to be determined and handled by the Local / National Safeguarding Focal Point.

All records relating to every allegation reported should be properly documented and retained even if there is no investigation. This can then be used for lesson learning.

1.3 Support for survivor(s) (**where necessary*)

The Local and/or National Safeguarding Focal Point (in cooperation with the Global Safeguarding Focal Point, where necessary) must provide appropriate support including referral services to survivor(s) of the reported safeguarding allegation. Survivor(s) must be supported and protected throughout the entire procedures of handling the case.

1.4 Investigation

The National Safeguarding Focal Point conducts investigations in consultation with investigation team (with the internal investigator or external party if needed) and interviews all involved personnel. Where necessary, interviews should be conducted by a well skilled and trained specialist in order to avoid re-traumatizing the child or vulnerable adult. S/he should ensure that all records relating to any safeguarding allegations are preserved and the reported concerns are kept confidential where possible.

Then, s/he and/or the investigation team make recommendations for the safeguarding committee to review.

1.5 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).
- **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.

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 Neighbours

- 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

2. Responsibilities of Safeguarding Focal Points

2.1 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
- 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

2.2 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

2.3 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

X. Safe Programming

1. Safe programming

Good Neighbours will ensure all programs, not only project activities but also research, advocacy, and fundraising campaigns, will be designed and implemented in accordance with the safeguarding policy.

- All programs will be designed with their priorities and best interests on children and vulnerable adults.
- Risk assessments will be conducted in all programming to identify potential risks of harm and prepare preventive measures.

2. Community feedback and complaints mechanisms

To ensure children and community members can raise their concerns to Good Neighbours, community feedback and complaints mechanisms will be set up in all program areas.

- In acknowledging that all children and community members have the right to share their opinions and report inappropriate behaviors conducted by GN employees and partners, the community feedback and complaints mechanisms will be set up in all GN program areas. It will be made available, visible and accessible to all children and community members with special consideration of accessibility (language, physical accessibility, communication).
- Each field country should ensure that all children and community members are aware of existing complaint mechanisms and procedures and how to raise a general suggestion or report misconduct by GN employees and partners.
- Each field country is responsible for responding to raised concerns in a fair and timely manner according to established procedures.
- Each field country should ensure safety, security and confidentiality of children and community members in managing community feedback and complaints mechanisms.
- All children can submit their complaints directly to GN without consent from their parents or responsible adults.

XI. Communications, Social Media and Digital Safeguarding Guideline

This guideline sets out Good Neighbours 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 Neighbours 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
- 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 7*).
- Be sure to receive the Consent Form for Gathering Personal Information and Sharing Content Online & Communication Materials (*see annex 8*) 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).

- 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 Neighbours.
- 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

GN partnership countries and global offices are responsible for ensuring the development, implementation, monitoring and evaluation of their own contextualized safeguarding policies and action plans in accordance with their local laws. In cases where this Policy conflicts with the local law or context, the more stringent standards are followed. Local legislation should be followed with guidance and advice from the designated safeguarding focal point and HR department.

A GN Global Safeguarding Report will be published annually based on the safeguarding annual reports submitted by all GN partnership countries and global offices.

GN partnership countries and global offices are responsible for submitting their safeguarding annual reports to the Global Safeguarding Focal Point on an annual basis.

The report should include the following

- safeguarding training activities
- a summary of reported incidents (a number of unsubstantiated and substantiated cases, a number of cases investigated and closed)
- results of substantiated cases (e.g. disciplinary warning, dismissal, contract termination, resignation, other actions)
- recommendations and feedback on policy from all relevant stakeholders

Global Safeguarding Focal Point shall monitor the safeguarding progress across the organization and regularly report it to ISC and GPC Board.

XIII. UK-Specific Requirements (Charity Commission Compliance)

Good Neighbours UK is registered with the Charity Commission for England and Wales and comply with its safeguarding guidance in addition to this global policy. The following provisions apply specifically to UK operations and supplement the global policy requirements set out above.

1. **Trustees Accountability:** All of GNUK Boards must have oversight of the Safeguarding Policy. The Board must ensure that safeguarding is a standing agenda item at all trustee meetings, that it receives regular safeguarding reports so it can provide proper oversight and guidance.

2. **Reporting Serious Incidents to the UK Charity Commission:** In addition to reporting to local authorities and internal channels, Good Neighbours UK must report serious incidents to the Charity Commission. A serious incident report must be submitted when a safeguarding incident results in or risks significant harm to beneficiaries, staff or volunteers; involves financial loss; damages or risks damaging the charity's reputation; or involves a criminal investigation. Reports must be made as soon as possible after the incident is identified. The UK National Safeguarding Focal Point is responsible for determining when a Charity Commission serious incident report is required, in consultation with the UK Director and Board. Reports should be submitted via the Charity Commission's online portal at gov.uk/report-a-serious-incident-in-your-charity

Related Policies and Guidance

This policy works alongside other Good Neighbours UK policies that all staff and volunteers must follow:

- Code of Conduct
- Whistleblowing Policy
- Privacy and GDPR Policy
- Recruitment Policy

The following resources support the delivery of this policy:

- GN Academy Safeguarding Training (available for staff and external partners)
- Safeguarding Guidelines

All staff should make sure they are familiar with these documents. If you are unsure where to find them, contact the UK National Safeguarding Focal Point.

Review Statement:

GNUM reserves the right to review and revise its policies and procedures to comply with any future statutory or legal requirements and to meet the organisation's needs, providing these are within the statutory and legal requirements. The next review is effective after 1 year of policy approval date.

Annex 1. Full Definitions

Definitions have been divided in three categories:

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

1. Parties included in this policy

- **Complainant:** The person who raises a complaint or concern, which may or may not be the survivor.
- **Good Neighbours employees, board members and partners:** The term includes all employees of Good Neighbours 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 Neighbours 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 Neighbours 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 Neighbours 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.