



ILP

Safeguarding Policy

Purpose

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

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

The policy lays out the commitments made by ILP and informs staff and associated personnel of their responsibilities in relation to safeguarding.

This policy does not cover:

- Harassment, bribery or fraud – these are dealt with under ILP's Legal and Ethical Behaviour Standards and other Human Resources and Finance Policies
- Safeguarding concerns in the wider community not perpetrated by ILP or associated personnel.

This policy is intended to replace ILP's existing safeguarding language in the Legal and Ethical Behaviour Standards. This Safeguarding Policy takes precedent in any conflict between it and any other ILP policy.

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children and adults at risk in the ME, including the Safeguarding Vulnerable Groups Act 2006 and Charity Commission guidance.

ILP has also taken into account international good practice in safeguarding in preparing this policy including the IASC Minimum Operating Standards for Protection from Sexual Exploitation and Abuse for UN and non-UN Staff.

What is safeguarding and what does it mean for ILP?

Safeguarding means *"the range of measures in place to protect people in a charity, or those it comes into contact with, from abuse and maltreatment of any kind.* In the NGO sector in general, we understand it to mean taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur.

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

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



As such, we understand our *specific safeguarding risks* to include, but not be limited to:

- Sexual abuse or exploitation committed *by our own staff or associated personnel* of any third party.
- Sexual abuse or exploitation *of our own staff or associated personnel* by any third party.

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

Scope of application

This policy applies equally to:

- The board of trustees.
- All staff contracted by ILP (under any contractual mechanism).
- Associated personnel whilst engaged with work or visits related to ILP, including but not limited to: auditors, trainers, consultants; volunteers; contractors; and programme visitors including but not limited to donors, auditors, journalists, staff relatives, researchers and politicians.

Review & approval

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

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

Policy statement

ILP believes that everyone we come into contact with, regardless of age, gender identity, disability, sexual orientation or ethnic origin has the right to be protected from all forms of harm, abuse, neglect and exploitation. ILP will not tolerate abuse and exploitation by staff or associated personnel. This policy will address the following areas of safeguarding: **child safeguarding**, **adult safeguarding**, and protection from **sexual exploitation** and **abuse**.

ILP commits to addressing safeguarding throughout its work, through the three pillars of prevention, reporting and response.

Prevention

ILP's responsibilities

ILP will:

- Ensure all staff have access to, are familiar with, and know their responsibilities within this policy
- Undertake its operations in a way that protects people from any risk of harm that may arise from their coming into contact with ILP.
- Implement appropriate safeguarding procedures when recruiting, managing and deploying staff and associated personnel



- Ensure staff receive orientation on safeguarding at a level commensurate with their role in the organisation.
- Appoint a Designated Person to ensure that safeguarding is given a high priority within ILP.
- Follow up on reports of safeguarding concerns promptly and according to due process

Staff responsibilities

Child safeguarding

ILP staff and associated personnel must not:

- Engage in sexual activity with anyone under the age of 18. This does not apply to national staff in bona fide and consensual relationships in respect of local law and custom. Mistaken belief in the age of a child is no defense.
- Sexually abuse or exploit children.
- Subject a child to physical, emotional or psychological abuse, or neglect.
- Engage in any commercially exploitative activities with children including child labour or trafficking.

Adult safeguarding

ILP staff and associated personnel must not:

- Sexually abuse or exploit at risk adults
- Subject an at risk adult to physical, emotional or psychological abuse, or neglect

Protection from sexual exploitation and abuse

ILP staff and associated personnel must not:

- Sexually exploit or abuse any person.
- Exchange money, employment, goods or services for sex or sexual favours. This includes, but is not limited to, using the services of sex workers, demanding sexual activity in exchange for assistance/service that is due to beneficiaries and demanding sexual activity in exchange for employment or administrative service.

Other responsibilities

ILP staff and associated personnel are obliged to:

- Contribute to creating and maintaining an environment that prevents sexual exploitation/abuse and safeguarding violations and promotes the implementation of this Safeguarding Policy.
- Report any concerns or suspicions regarding safeguarding violations by an ILP staff member or associated personnel to the appropriate staff member as set out below.

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

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



Communicating ILP's Safeguarding policy and procedures

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

Relationships with NGO beneficiaries

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

Safeguarding in recruitment

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

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

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

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



satisfactory results.

Where we become aware that any current staff member may pose a risk to children and/or at risk adults we will comply with the legislation and relevant guidance in respect of referring that representative to the relevant authorities if appropriate³.

Recruitment of trustees will be undertaken in accordance with applicable guidance from relevant local regulators. In England and Wales, this includes guidance issued by the Charity Commission for England and Wales.

Reporting

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

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

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

ILP Organization is committed to creating a safe environment for all personnel, recipients of assistance, and communities, including children, by providing **clear, accessible, and confidential mechanisms** for reporting incidents of sexual exploitation and abuse (SEA). The organization understands the importance of ensuring that victims or witnesses feel safe and supported when coming forward with concerns, and that their reports are handled with the highest standards of **confidentiality, safety, transparency, and accessibility**.

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

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

More information on safeguarding principles, practices and obligations across the charitable sector is provided in the Further Reading section at the end of this Policy.



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

Any staff reporting genuine concerns or complaints (or if they request it) will be protected by SG04_Whistleblowing Policy.

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

1. Core Standards for Reporting

To ensure the integrity of the reporting process, ILP adheres to the core standards for reporting SEA, as follows:

- **Safety:** Reports of SEA can be made **without fear of retaliation**. The safety and well-being of the reporter and any potential victims are a primary concern. No employee or beneficiary will face any harm, discrimination, or negative consequences for reporting allegations in good faith.
- **Confidentiality:** All reports are handled in strict **confidence**. Information provided during the reporting process will only be shared on a **need-to-know basis** to protect the identity and safety of the person making the report and those involved in the allegation. ILP ensures that personal data and sensitive information are safeguarded according to relevant privacy laws and organizational policies.
- **Transparency:** The process for reporting SEA allegations is **clear and transparent**, with individuals knowing how their reports will be handled, who will be responsible for addressing them, and the potential outcomes. ILP ensures that all those involved in reporting are kept informed of the progress of investigations, as appropriate, and that they understand the process from start to finish.
- **Accessibility:** Reporting mechanisms are designed to be **accessible** to all personnel, beneficiaries, and community members, including children. This includes providing multiple channels through which individuals can report SEA incidents, and ensuring these channels are understandable and available in relevant languages and formats for different communities.

2. Reporting Mechanisms

ILP provides a range of **reporting mechanisms** to ensure that anyone, whether personnel, beneficiaries, or community members, can report SEA allegations safely and easily:

- **In-Person Reporting:** Beneficiaries, staff, and community members can report allegations directly to any ILP staff member, supervisor, or safeguarding focal point. This face-to-face option ensures that individuals who prefer personal interaction or may have limited access to technology can still safely raise concerns.
- **Anonymous Reporting Channels:** For those who may fear retaliation or want to remain anonymous, ILP provides an **anonymous reporting hotline** and **online reporting platforms**. These channels allow individuals to report SEA allegations without disclosing their identity, while still ensuring that the report is appropriately addressed.



- **Confidential Reporting Forms:** ILP also uses **confidential reporting forms** that can be filled out and submitted by individuals who wish to report SEA allegations. These forms are available both physically in offices and online, and include clear instructions on how to fill them out and where to submit them.
- **Email and Helpline Access:** A dedicated **PSEA email** and **helpline** are also available for reporting SEA concerns. The helpline is staffed by trained professionals who provide immediate assistance, offer guidance on how to submit a report, and help individuals navigate the reporting process.
- **Third-Party Reporting:** In cases where individuals are hesitant to report directly to ILP personnel, they are encouraged to report concerns through **third-party organizations** or **local authorities**, with ILP ensuring cooperation and follow-up as needed. These third parties may include trusted community leaders, local NGOs, or human rights organizations with whom ILP has partnerships.

3. Safeguards for Vulnerable Groups

ILP places a strong emphasis on **ensuring that vulnerable groups**, including **children** and **beneficiaries with disabilities**, have access to effective reporting mechanisms. The following measures are implemented to cater to these groups:

- **Child-Friendly Reporting Channels:** ILP provides **child-friendly reporting mechanisms**, ensuring that children and minors can report SEA incidents in a way that is suitable for their age and development. This may include the use of visual aids, confidential child helplines, or trusted child protection officers who can assist in the reporting process.
- **Supportive Communication:** Staff trained in **child protection** and **psychosocial support** are available to assist children and vulnerable adults through the reporting process, providing emotional support, ensuring their safety, and explaining the process in a sensitive and supportive manner.
- **Disability-Inclusive Reporting:** ILP ensures that reporting systems are **inclusive of persons with disabilities** by providing accessible formats, including braille, sign language interpreters, or easy-to-read materials, to ensure that these individuals can report SEA incidents without barriers.

4. Procedure for Handling SEA Allegations

Once a report of SEA is made, ILP follows a **clear and transparent procedure** for investigation and response:

- **Acknowledgment:** ILP acknowledges receipt of all complaints in writing, assuring the complainant that their report has been received and is under review.
- **Investigation:** An independent, thorough, and impartial investigation is conducted, led by trained personnel or an external third-party investigator where necessary. ILP ensures that investigations are conducted in a **timely** and **transparent** manner, and that both the person reporting the incident and the accused are treated fairly throughout the process.
- **Protection of Victims and Witnesses:** ILP takes immediate action to ensure the **protection and well-being** of the person making the report, any victims, and any witnesses, including providing **psychosocial support**, legal advice, or medical assistance as needed. If the person reporting the SEA is at risk, steps will be taken to ensure their **safety**.



- **Outcome and Follow-up:** Once the investigation is complete, ILP provides the person who made the report with **feedback on the outcome**, while maintaining confidentiality. Any action taken, including disciplinary measures, will be handled in accordance with ILP's **policies** and local laws. Follow-up mechanisms are also in place to monitor the situation and prevent further incidents.

5. Training and Awareness

ILP ensures that all personnel, recipients of assistance, and community members are made aware of the available reporting mechanisms through **ongoing training** and **public awareness campaigns**. This includes:

- Regular **PSEA training** for all employees and partners, outlining how to report SEA allegations.
- **Community outreach** programs to inform beneficiaries and local communities about how to report SEA incidents.
- **Posters and information materials** displayed in project locations and offices, providing clear instructions on how to report allegations.

How to report a safeguarding concern

Safeguarding concerns must be reported directly to ILP's Designated Person ILP's CEO through ,email : Complaints.alhubalsalam@gmail.com

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

Response

ILP will follow up safeguarding reports and concerns according to policy and procedure, and legal and statutory obligations

ILP will apply appropriate disciplinary measures to staff found in breach of policy. It is ILP policy to report all crimes to the relevant law enforcement authorities unless doing so may pose a risk to anyone involved in the case.

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

Confidentiality

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



Glossary of Terms

Adult Safeguarding

Protecting at risk adults' right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the vulnerable adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal safety and well-being.

At risk adult

Sometimes also referred to as vulnerable adult. A person who is or may be in need of care by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

Child

Child Safeguarding

This term is broader than 'child protection' and relates to the action taken to promote the welfare of children and protect them from harm. Safeguarding and promoting the welfare of children is defined in ME government guidance Working together to Safeguard Children as:

- (a) protecting children from maltreatment;
- (b) preventing impairment of children's health or development;
- (c) ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- (d) taking action to enable all children to have the best outcomes.

Harm

Psychological, physical and any other infringement of an individual's rights

Psychological harm

Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation

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 General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13)

Safeguarding

In the ME, safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect. In our sector, we understand it to mean protecting people, including children and at risk adults, from harm that arises from coming into contact with our staff or programmes. One donor definition is as follows:



Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur.

This definition draws from our values and principles and shapes our culture. It pays specific attention to preventing and responding to harm from any potential, actual or attempted abuse of power, trust, or vulnerability, especially for sexual purposes.

Safeguarding applies consistently and without exception across our programmes, partners and staff. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialise. Those systems must be survivor-centred and also protect those accused until proven guilty.

Safeguarding puts beneficiaries and affected persons at the centre of all we do.

Survivor

The 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.