

COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE



SAFEGUARDING POLICY

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PURPOSE

Our Commitment

The purpose of this policy is to protect people, particularly our beneficiaries, staff, volunteers, partners, consultants, contractors and trustees (our community), from any harm that may be caused due to their coming into contact with COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE.

COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE has a zero-tolerance approach to serious misconduct and will not tolerate its staff, trustees, volunteers, consultants, partners or any representatives associated with the work of COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE or its partners carrying out **any form of violence, abuse, harassment or exploitation**.

Personal Responsibility

It is the responsibility of each one of us to prevent and report the physical, sexual, emotional abuse or neglect of any member of our community. The welfare of these individuals is paramount. All our community without exception have the right to protection from abuse regardless of gender, ethnicity, disability, sexuality or belief.

As a member of the COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE community, you have the responsibility to raise any concerns you may have or those which are reported to you according to this policy. It **is not your responsibility** to decide if an incident of violence, abuse, harassment or exploitation has taken place or whether an incident constitutes a safeguarding breach. This is the responsibility of the Safeguarding Focal Person.

Policy Development

The COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE Safeguarding Policy has been adapted in line with the partnership requirements of International donor organizations to reflect global best practice and using the experience and expertise of colleagues working with ACT Alliance, the Core Humanitarian Standard on Quality and Accountability (CHS) and Bond International.

WHAT IS SAFEGUARDING AND WHAT DOES IT MEAN FOR COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE?

In the UK, 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 COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE specifically however it is necessary to consider that, as an NGO service provider, 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.

POLICY APPLICATION

The policy also applies to all those engaged, commissioned or contracted to work with or on behalf of COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE in any capacity. COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE requires all partners and consortium members to have a Code of Conduct or equivalent standards that set out, at a minimum, the obligation of staff not to exploit; abuse or otherwise discriminate. COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE will work with all partners to adopt policies, practices and associated measures to ensure the Code of Conduct is established and communicated to relevant stakeholders, especially people and communities the partners work with. COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE also expects all partners to have appropriate safeguarding policies and procedures and makes its own policy and procedure available to them.

All those who work or volunteer with COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE will have a clear understanding of what is required by this policy and of what to do if they have any concerns.

SCOPE

This is a policy in line with global standards which has been adapted as required to by local law. To the extent that International law provides a higher standard this must always be adopted. The Safeguarding Focal Person is available to provide advice on this.

While this is an internal policy, we expect partners and others working on behalf of COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE to act in accordance with the key principles contained within it, and specific compliance requirements in respect of safeguarding as set out in relevant contractual agreements and included in our due diligence process.

POLICY PRINCIPLES

The principles in this policy have been drawn from key international and regional instruments such as: International Standards for Keeping Children Safe, the UN Convention on the Rights of a Child, IASC Minimum Operating Standards for PSEA and the Core Humanitarian Standard.

COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE is committed to:

- Safeguarding the wholeness and wellbeing of beneficiaries, staff, volunteers, and all those connected with the activities of COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE, and ensuring they have equal rights to protection from harm.
- The organisation maintains a register of safeguarding risks and mitigation measures, including programme risks and organisational risks. The Board and senior management regularly manage and monitor the risk register.
- Ensuring concerns or allegations are taken seriously, investigated and acted on as appropriate.
- Ensuring all its staff, trustees, volunteers, consultants, contractors and partners or any representatives of COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE are familiar with this policy and know their responsibilities within it.

- Put in place systems through the aid of the ICT team to securely store data and prevent access to inappropriate sexual or illegal online content. All programme, project and activities are forwarded to the Communications Department through communications personnel from the field and saved securely for future references.
- Ensuring our partners are aware of their responsibility as to the minimum requirements on safeguarding standards and support them in achieving this.
- All staff, volunteers and trustees receiving safeguarding training.
- Ensuring all actions on protecting people are taken in the best interests of the person at risk.
- Ensuring that survivors of abuse are supported, and alleged perpetrators are held to account.
- Ensuring our recruitment practices are robust enough to ensure we never recruit anyone who poses a known risk.
- Ensuring that alleged perpetrators of abuse are treated fairly and in accordance with local law.
- Reporting criminal acts to the relevant statutory agency
- Reporting all incidents of sexual harassment and abuse to the Ministry of Human Services and Social Development (MoHSSD) through the Sexual Assault Response Centers (SARC) using the survivor centered approach
- Reporting incidents to relevant donors.
- Designing and delivering programmes which are safe for all and are based on the 'do no harm' principles.
- Ensuring our beneficiaries and supporters are fully aware of the expected behaviour of our staff, volunteers, trustees, consultants and partners.

REVIEW & APPROVAL

This policy will be reviewed, approved and endorsed by the COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE Board of Trustees annually, or when there are changes in applicable legislation and/or regulatory guidance. This document will also be reviewed by the COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE executive management team after any safeguarding incident is reported and/or investigated.

VULNERABILITY

As defined by the Core Humanitarian Standard people may be vulnerable because of individual factors such as age (particularly the very young and the

very old), disability or illness or because they are caring for others who are vulnerable.

Social and contextual factors also contribute to people's vulnerability. These include:

- discrimination and marginalization (e.g. in some contexts, the low status and power of
- women and girls), social isolation (including the lack of access to information), environmental
- degradation (e.g. soil erosion or deforestation), climate variability, poverty, lack of land
- tenure, poor governance, ethnicity, class, caste, and religious or political affiliations.

PREVENTION

COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE's responsibilities

COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE will:

- Ensure all staff has 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 COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE.
- Encourage an open and transparent culture which addresses power and privilege. Leaders model respect and accountability in their relationships with everyone. Leaders take complaints seriously and act on them in a timely manner.
- Implement appropriate safeguarding procedures when recruiting, managing and deploying staff and associated personnel
- Ensure staff receives orientation on safeguarding at a level commensurate with their role in the organization.
- Appoint a Designated Person to ensure that safeguarding is given a high priority within COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE.
- Follow up on reports of safeguarding concerns promptly and according to due process.

Staff responsibilities

Child safeguarding

COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE 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 defence.
- 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 labor or trafficking.

Adult safeguarding

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.

COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE 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

A person may abuse by inflicting harm or failing to prevent harm. In order to safeguard all those in our community we adhere to the principles of the UN Convention on the Rights of the Child across the board, and have as our starting point as a definition of abuse, Article 19 which states:

- Parties shall take all appropriate legislative, administrative, social and educational measures to protect the child from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s) or any other person who has the care of the child.
- Such protective measures should, as appropriate, include effective procedures for the establishment of social programmes to provide necessary support for the child and for those who have the care of the child, as well as for other forms of prevention and for identification, reporting, referral, investigation, treatment and follow-up of instances of child maltreatment described heretofore, and, as appropriate, for judicial involvement.

Also for adults the UN Universal Declaration of Human Rights with particular reference to Article 5 which states:

No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment.

COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE 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.

Abuse may also include, but is not exclusive to:

Physical abuse or physical injury, such as evidence of hitting, kicking or shaking, where there is definite knowledge or reasonable suspicion, that the injury was inflicted or knowingly not prevented.

Emotional abuse where harm is done by persistent or severe emotional ill treatment or rejection, such as degrading punishments, threats and not giving care and affection, resulting in adverse effects on behavior and emotional developments of a person.

Sexual abuse: where exploitation of a person occurs. This includes rape, incest and all forms of sexual activities including pornography. Exchanging of benefits, for example goods, food and money in exchange for sexual favours

Neglect, where basic needs such as food, warmth and medical care are not met, or when there is a failure to protect a person from exposure to any kind of danger, resulting in serious impairment of a person's health or development.

Sexual Harassment is unwanted behavior of a sexual nature which: violates your dignity, makes you feel intimidated, degraded or humiliated or creates a hostile or offensive environment.

You don't need to have previously objected to someone's behavior for it to be considered unwanted. Sexual harassment can include:

- sexual comments or jokes
- physical behaviour, including unwelcome sexual advances, touching and various forms of sexual assault
- displaying pictures, photos or drawings of a sexual nature
- sending texts or emails with a sexual content

Other responsibilities

COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE 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 a COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE 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 COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE's international and national staff members.
- Relationships between COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE's international staff and members of the local general public

COMMUNICATING COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE'S SAFEGUARDING POLICY AND PROCEDURES

This policy and associated procedures are publicly available on COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE's website and COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE 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 COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE facilities.

Safeguarding in recruitment

It is our policy that no-one shall work within COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE who:

- Has been convicted of or has received a formal police caution concerning an offence against children; or
- Has been convicted of or has received a formal police caution concerning sexual offences against adults; or
- Is notified to us as having a red flag in relation to safeguarding by a former employer

COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE will ensure all workers will be appointed, trained, supported and supervised in accordance with government guidance on safe recruitment. This includes ensuring that:

- There is a written job description / person specification for the post
- Those applying have completed an application form including a self-declaration disclosure in relation to safeguarding
- Those short listed have been interviewed
- Safeguarding has been discussed at interview where the applicant will be working with children, adults and risk or beneficiary communities
- Two references have been obtained including one from the most recent employer
- Qualifications where relevant have been verified
- A suitable training programme is provided for the successful applicant
- The applicant has completed a probationary period

- The applicant has been given a copy of the organisation's safeguarding policy and knows how to report concerns.
- The successful application signs COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVEs Code of Conduct and performs the on-line training on appointment.

REPORTING

What to do when you suspect alleged abuse:

Actual, potential or suspected incidents of abuse must be reported immediately. Where appropriate you should make a report to your Line Manager or HR representative who will inform the Safeguarding Focal Person immediately. The Safeguarding Focal Person will ensure that the matter is appropriately investigated. Alternative reporting mechanisms are also noted below.

The need to report arises in the following instances:

- Abuse is observed or suspected
- An allegation of abuse is made
- Someone discloses abuse

No representative of COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE will prejudice their own position or standing with COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE by responsibly reporting potential or suspected abuse.

It is important to note that where representatives report concerns, it **is not their responsibility** to decide if abuse is taking place, but it is their responsibility to pass these concerns on. Care must be taken regarding confidentiality and the sharing of information with appropriate people.

Information given should be written in a report as soon as possible after the concern was raised (within 24 hours if possible). Any written records taken must be kept securely in a locked place or in a confidential electronic folder.

Under no circumstances should any individual attempt to deal with the problem of abuse directly. An investigation team will be established supported by the Safeguarding Focal Person.

COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE 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 minimized.

Therefore, COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE 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, COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE has appointed a Safeguarding Officer as the safeguarding Designated Person who is responsible for ensuring that safeguarding is given high priority within COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE. Specific responsibilities of this role include:

- Providing an organization wide focal point for managing and reporting incidents and allegations;
- Providing support and advice to COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE 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 COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE;
- Continuous development of a robust and compliant safeguarding policy for COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE;
- 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 COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE's safeguarding policy and procedures being integrated into the induction programme of all new COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE 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.

As stated above, COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE trustees, staff and volunteers work directly with at risk adults or children as part of their mandate. However, should an instance occur where a COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE 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 Whistleblowing Policy.

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

How to report a safeguarding concern

Safeguarding concerns must be reported directly to COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE's Designated Person (COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE's Safeguarding Officer, safeguarding@communitylinks.org.ng)

Response

COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE can and will take any disciplinary action necessary against staff or others if they are found to have breached our Code of Conduct and Safeguarding Policy. If such an incident occurs, COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE disciplinary policy will be invoked.

There will be times when the behavior of employees may constitute a breach of the Code of Conduct, but not be considered criminal conduct under Nigerian or local legislation. In this instance COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE may consider providing other support to these staff, for example, training, counseling, increased supervision or transfer to other duties. This will be cognizant of any ongoing risk to beneficiary communities, staff and volunteers and we will always err on the side of caution. There may be cases where COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE feels it is appropriate to

dismiss an employee even if the behavior is not criminal, for example a gross violation of the Safeguarding Policy or Code of Conduct.

Identifying information about safeguarding should be shared on a 'need to know' basis only. Any staff members who raise concerns of serious malpractice should be protected as far as possible from victimization or any other detrimental treatment if they come forward with concerns, if concerns are raised in good faith. Deliberate false allegations will be made a serious disciplinary offence and investigated by COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE.

The Safeguarding Focal Person will ensure that reports are made to the relevant donors and where applicable to relevant statutory authorities.

Supporting those affected by abuse

COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE is committed to offering pastoral care, and to support to all those who have been affected by abuse that have contact with or are part of COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE. A range of resources are provided by the People Function.

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.

Code of Conduct & Responsibilities

All staff, trustees, consultants and volunteers and representatives of COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE must follow the Code of Conduct. The following are relevant to safeguarding.

As a representative of COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE, I will:

- i. Ensure that my personal and professional conduct is, and is seen to be, of the highest standards and in keeping with COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE's beliefs, values and aims.

- ii. treat all people fairly and with respect and dignity and recognise the professional opinion of others.
- iii. seek to ensure that my personal conduct does not compromise COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVES values and does not impact on or undermine my ability to undertake the role for which I am undertaking.
- iv. not say or do anything that would damage the reputation of COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE or which may bring the charity into disrepute.
- v. not abuse my position as a COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE representative by requesting any personal service or favour from others in return for any assistance by COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE .
- vi. not enter into commercial sex transactions. For the purpose of this Code of Conduct, a transaction is classed as any exchange of money, goods, services or favours with any other person.
- vii. not have sexual relations with beneficiaries, recognising in both cases the inherent unequal power dynamics and that such behaviours can undermine the integrity and credibility of COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVES work.
- viii. not exchange money, offers of employment, employment, goods or services for sex or sexual favours, nor any forms of humiliating, degrading or exploitative behaviour.
- ix. not have sexual relations with children (defined as under 18 years old);
- x. ensure that my relationships and behaviour are not exploitative, abusive or corrupt in any way.
- xi. respect all peoples' rights, including children's rights, and will not engage in any form of sexual abuse or exploitation of any persons of any age. I will behave in an appropriate manner against all guests and representatives working in COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE guest houses.
- xii. If I become aware of any form of illegal activity, relating to COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE, its representatives or beneficiaries or where there is a safeguarding risk, I will make it known to the Head of Region.
- xiii. I will abide by COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVES Safeguarding Policy and will not engage in inappropriate or sexual behaviour with children under the age of 18.
- xiv. I will not abuse or exploit children under the age of 18 in any way and will report any such behaviour of others to my line management.

- xv. Refrain from any form of harassment, discrimination, physical or verbal abuse, intimidation or exploitation, both in and out of work.
- xvi. I will not enter into a sexual relationship with any beneficiary of assistance since such relationships are based on inherently unequal power dynamics and undermine the credibility and integrity of the work of COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE.
- xvii. I will not sexually harass any of my colleagues.

Responsibilities in relation to Children & At-Risk Adults

Representatives of COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE **must not:**

- Hit or otherwise physically assault or physically abuse children or adults at risk
- Develop physical/sexual relationships with children or adults at risk
- Develop relationships with children or adults at risk, which could in any way be deemed exploitative or abusive
- Place themselves in a position where they could be accused of sexually abusing a child, young person or adult at risk, i.e. holding or hugging a child, young person or adult at risk, or physically touching children, young persons or adults at risk in a way that could be considered abusive in ways described in this document
- Spend time alone with children or adults at risk. Plan activities so that more than one person is present or, at least, other people are within sight and hearing. Wherever possible ensure that another adult is present to supervise the activity
- Take children/adults at risk alone in a car, even on short journeys
- Act in ways that may be abusive or may place a child or adult at risk at risk of abuse
- Use language, make suggestions or offer advice which is inappropriate, offensive or abusive
- Offer benefits such as food, favours, clothes, jobs, money in exchange for sexual favours
- Show favouritism to any individual for sexual favours in return.
- Act in ways intended to shame, humiliate, belittle or degrade children or adults at risk, or otherwise perpetrate any form of emotional abuse.

All representatives **must:**

- Treat everyone with respect, recognising their right to personal privacy
- Be aware of situations that may present risks and manage these

- Plan and organise the event so that risks are minimised
- Avoid being drawn into inappropriate attention seeking behaviour, such as tantrums or crushes
- If a residential event is being planned, ensure that adults and children have separate sleeping accommodation. Never sleep in the same room or bed as a child or adult at risk with whom they are working
- Remember that someone else may misinterpret your actions, no matter how well intentioned
- Adults should avoid being placed in a compromising or vulnerable position. The adult is always considered responsible even if a child behaves seductively.

Programming, Partners and Consortium Members

- COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE works in many communities and across a broad range of circumstances. Translating safeguarding across these different contexts and cultures can be difficult. Some legal and cultural frameworks may vary but the commitment from Health Watch Foundation to protect people remains.
- COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE has a commitment to design and deliver programmes which are safe for people. This will ensure that programmes and projects will be risk assessed including in the areas of people's safety, security, dignity and rights.
- A commitment to safeguarding is fundamental to COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE:s partnership approach to work. COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE, through its representatives, will challenge and help new and existing partners and consortium members (where they are not already doing so) to address safeguarding in their organization and in the communities in which they work. All COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE partners and consortium members will be required to evidence what measures they have in place to protect people at risk from abuse.
- External support staff during their work should support partners and consortium members in their efforts to increase their awareness, knowledge and skills in relation to safeguarding issues through the provision of appropriate capacity building and resources.
- Safeguarding concerns may be more likely in emergency situations, particularly where people are displaced and separated from their families, or where the family is under extreme stress, people then become particularly vulnerable. Representatives of COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE are expected to be extra vigilant to follow the

code of conduct, ensure reporting mechanisms and support partners at these times to ensure those people are protected from harm.

Fundraising & Other Interactions

- 'Supporter fundraising' refers to the engagement of individuals, Faith Based Organizations and communities and personal trusts and foundations in their voluntary support of COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVES work around the world.
- These policies are trained out to all relevant staff and volunteers alongside tailored Safeguarding training.
- Costs for safeguarding activities are included in funding proposals (staff costs, training costs, Community-Based Reporting Mechanism etc)

Governance & Oversight

- The Audit Committee provides oversight of the Safeguarding Policy on behalf of the board. It receives confidential reports on incidents and also approves separate reporting, where applicable.
- NIGERIA Gender Based Violence Actors response, Child Protection team and development partners ensure that COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVE meets its regulatory requirements and oversees the implementation of actions to further embed the policy in all areas of COMMUNITY LINKS & HUMAN EMPOWERMENT INITIATIVES work.

Glossary of Terms

Adult Safeguarding

This means Protecting at risk adults' right to live in safety, free from abuse and neglect. It is about people and organizations 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 recognize 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 they are 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

A person below the age of 18

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 UK 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 UK, 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 materialize. Those systems must be survivor-centered and also protect those accused until proven guilty.

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

Survivor

This is mainly 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.

f. ~~Amerson~~

BOARD CHAIRMAN

July 1, 2022

DATE

clm

EXECUTIVE DIRECTOR

July 1, 2022

DATE