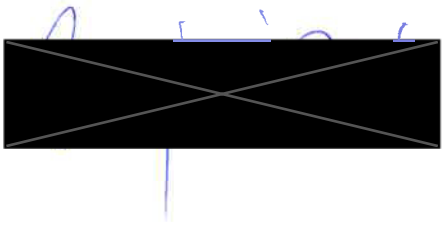
People in Peril Safeguarding Framework

July 2023

Drafted by	Timea Stranska, Global Head of Programmes, Relief and Development Department
Approved	18 July 2023
Approved by	Andrea Najvirtova, Executive Director



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INTRODUCTION TO THE SAFEGUARDING FRAMEWORK

People in Peril (PIP) is a non-governmental, non-profit organisation providing relief and development assistance worldwide, as well as educational activities and assistance in vulnerable communities in Slovakia. PIP is committed to the best practice and quality of work of its staff, its partner organisations and other associates.

POLICIES INCLUDED IN THE SAFEGUARDING FRAMEWORK

The PIP Code of Conduct represents the essence of the PIP Policies and must be read in conjunction with all the Key PIP Policies listed below. The Safeguarding Framework stands to define a minimum package of ethical standards of behaviour and includes:

- PIP Code of Conduct
- PIP Safeguarding Policy
- PIP Child Safeguarding Policy
- PIP Prevention of Sexual Exploitation and Abuse (PSEA) Policy
- PIP Whistleblowing Policy

Furthermore, policies above must be read in conjunction and are complemented by:

- PIP AAP Framework
- PIP Complaints, Feedback and Response Mechanism (CFRM)
- Supporting documents included as Annexes to these policies

POLICY STATEMENT

- *All people have the same right to freedom from abuse and exploitation.* PIP believes that everyone who comes into contact with PIP should be treated with dignity, regardless of age, gender, disability, sexual orientation or ethnic origin or any other diversity, and they have the right to be protected from all forms of harm, abuse, neglect and exploitation. Therefore, PIP staff and partners must never engage in any forms of humiliating, degrading, abusive, exploitative or other forms of unacceptable behaviour under any circumstances.
  PIP acknowledges that certain vulnerable groups - such as children, women, the elderly, disabled people and others - might be particularly at risk and must receive our greatest attention.
- *PIP does not tolerate any form* of sexual exploitation, abuse and harassment, intimidation, discriminatory behaviours, as well as bullying and a range of non-sexual abuse of power perpetrated by PIP staff and partners against any individual regardless of age, gender, sexuality, disability, religion or ethnic origin, or any other diversity.
- *PIN commits to do all the needful* for preventing its programs having any negative effects, such as Sexual Exploitation and Abuse (SEA) by PIP staff and partners against beneficiaries and members of the community.
- *PIP takes seriously all the complaints and concerns* about any violation of its code of conduct, including sexual exploitation, abuse and harassment, intimidation, discriminatory behaviours, as well as bullying and a range of non-sexual abuse of power. PIP will initiate rigorous inquiry and/or investigation of complaints that indicate a possible violation of this policy, PIP Code of Conduct and all PIP policies included in the Safeguarding Framework.
- *Sexual Exploitation and Abuse (hereinafter SEA) and any breach of the Child Safeguarding Policy are a violation of PIP's Code of Conduct and Safeguarding Policy* and constitute acts of gross misconduct and are therefore grounds for termination of employment.

APPLICABILITY

All the policies included in this Framework are applicable for all employees and associates of PIP, including the management team, employees, staff working on other type of contracts, consultants, interns and volunteers[1] (hereinafter referred to as 'PIP staff'), as well as partner organisations[2] (hereinafter referred to as 'partners') working in the name of PIP (unless they have their own policies). Key principles of this Framework are also applicable to external suppliers in direct contact with PIP beneficiaries.
The policies included in this Safeguarding Framework (PIP Key Policies) are applicable both inside and outside of office hours.

Partners
Adherence to and compliance – to the relevant extent – with this Policy, including the PIP Code of Conduct, must be included in every partnership agreement or contract. In case that a PIP partner organisation does not comply with the principles of this Policy, PIP reserves the right to withdraw funding and/or terminate any existing partnership agreements.

As PIP recognizes that partner organisations might have their own existing policies, codes or other instruments, this Policy and the PIP Code of Conduct does not seek to replace or nullify them. Representatives of partner organisations must ensure that partner organisation staff and associates adhere to the key principles of ethical behaviour and standards of conduct, all necessary and relevant procedures within their organisation are set up and monitored, Complaints, Feedback and Response Mechanism (CFRM) for beneficiaries is established (if applicable) and that appropriate actions are taken when the standards of this Policy are not adhered to.

Unless PIP has resources to implement a more comprehensive package of actions, it is provided that, at a minimum, partner organisations working in the name of PIP will be:

- receiving and signing all related policies of the Safeguarding Framework, including the Code of Conduct, the Safeguarding, Child Safeguarding, PSEA and Whistleblowing policies
- sharing their own policies
- implementing their own processes.

It is to be noted that PIP Safeguarding framework applies to partners in absence of their own policies – with the exception of the PIP Whistleblowing Policy, which applies only in situations that directly involve and/or affect PIP.

After gaining full capacity, PIP will:

- thoroughly assess partner organisations' policies and processes
- and support their enhancement or development in case it was identified that policies are lacking, or the existing ones could be strengthened.

Shall a breach of PIP policies be identified, it may be considered as a ground of termination of contract with partner organisations.

[1] Volunteers above 18 which are in direct contact with PIP beneficiaries or represent PIP externally.
[2] In this context, "partner organisation working in the name of PIP" is an entity for which PIP provides financial or other resources, i.e. usually national or international NGO

ROLES AND RESPONSIBILITIES

Creating a safe working environment at PIP is everyone's responsibility and failure to act on concerns or disclosures is not an option.

- *PIP Human Resources (HR) Department* holds the overall responsibility for this Framework and all its policies and their implementation. It is responsible for reviewing and updating this Framework and its policies annually and in line with the legislative and organisational developments and for its promotion amongst all persons to whom the Framework is applicable.
- *All PIP staff* (as defined under "Applicability" above) are required to adhere to this PIP Safeguarding Framework and all its related key policies – including the Code of Conduct, Safeguarding Policy, Child Safeguarding Policy, and Prevention of Sexual Exploitation and Abuse (PSEA) Policy at all times (i.e. including out of office hours). All PIP staff, and in particular the Management Team, Senior Managers and Country Directors, are also responsible for monitoring of application of this Framework.
- *All PIP staff* are obliged to report any suspicions of breach of the provisions in this Framework, including any of its related policies, as per reporting instructions stipulated in the Whistleblowing Policy.

SAFEGUARDING FOCAL POINTS

While the overall accountability for safeguarding lies with PIP HR and Senior Management, Safeguarding Focal Points are key functions which will be identified and trained to ensure Safeguarding principles and practices are cascaded into PIP programmes, and that the communities PIP works with feel safe and know how to report on potential breach of Safeguarding.
The Safeguarding Focal Points work in close coordination with the HR, the Senior Management and the MEAL team and all the PIP Safeguarding Focal Points and may be identified within Protection or Child Protection staff, in some instances, otherwise within the MEAL or HR team themselves – depending on the structure. The Safeguarding Focal Points work within the PIP Safeguarding Policy Framework, PIP's Accountability to Affected Population (AAP) Framework, and all CFRM and Investigation procedures tools.

The role and responsibilities revolve around the following areas:

- Support to safer recruitment where possible and to capacity development
- Support to procedures and systems for case reporting, management, and response
- Support to safer programming (including risk analysis and management)

In order to do so, the Safeguarding Focal Points will be duly trained on Safeguarding Framework and all reporting and case management procedures, including internal reporting and CFRM.
For further details of their role and responsibilities, please find the Safeguarding Focal Point Terms of Reference in Annex 3.

BASIC PRINCIPLES OF INVESTIGATION

The reaction to a complaint or report shall result in a confidential, sensitive, thorough and prompt inquiry and/or investigation. Such an investigation may either result in the reduction of concern or in further action(s) outlined in this document as appropriate. The subject of the complaint must have an opportunity to explain and/or reply to the allegations before any disciplinary action be taken. The complainant and the subject of the complaint will be protected against any form of intimidation, threats, reprisal or retaliation resulting from the alleged incident. If any PIP staff is found intimidating or retaliating against a complainant or a person assisting in an investigation, a disciplinary action - up to and including dismissal - will be imposed. All information related to the case will be held in strict confidence and might be

disclosed only on a need-to-know basis. Any intentionally false or malicious statements or accusations against another staff member or third party will be considered as gross misconduct. All concerns about breaches of these standards of conduct expressed either by PIP staff or beneficiaries must be recorded and securely filed. In the event of an allegation of a criminal offence, the concerned individual should be informed that, in addition to disciplinary action, the case may be reported to appropriate legal authorities for further investigation.

ACCEPTANCE OF THE SAFEGUARDING FRAMEWORK

The PIP Code of Conduct and Safeguarding Framework constitute an inseparable part of contracts with all PIP staff and have to be reflected – to the relevant extent – in all contractual relationships with PIP. Understanding and acceptance of these policies is done by signature of contract with PIP.

TERMINOLOGY

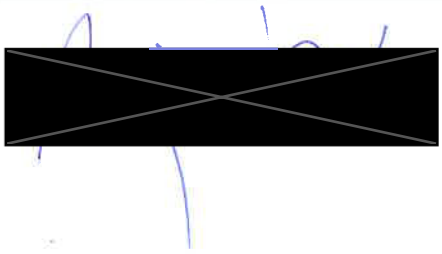
Safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect. In our sector, we understand it to mean protecting people, including children and at risk adults, from harm that arises from coming into contact with our staff or programmes. Please refer to PIP Code of Conduct for all the relevant definitions.

Safeguarding or Protection?
An easy way to differentiate it:
Safeguarding: safe from us
Protection: safe from others

People in Peril
Safeguarding Policy

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4. POLICY STATEMENT

- *All people have the same right to freedom from abuse and exploitation.* PIP believes that everyone who comes into contact with PIP should be treated with dignity, regardless of age, gender identity, disability, sexual orientation or ethnic origin or any other diversity, and has the right to be protected from all forms of harm, abuse, neglect and exploitation. Therefore, PIP staff and partners (as defined under "Applicability" below) must never engage in any forms of humiliating, degrading, abusive, exploitative or other forms of unacceptable behaviour under any circumstances.
  PIP acknowledges that certain vulnerable groups - such as children, women, the elderly, disabled people and others - might be particularly at risk and must receive our greatest attention.
- *PIP does not tolerate any form* of sexual exploitation, abuse and harassment, intimidation, discriminatory behaviours, as well as bullying and a range of non-sexual abuse of power perpetrated by PIP staff and partners against any individual regardless of age, gender, sexuality, disability, religion or ethnic origin, or any other diversity.
- *PIP commits to do all the needful* for preventing its programs having any negative effects, such as sexual exploitation and abuse by PIP staff and partners against beneficiaries and members of the community.
- *PIP takes seriously all the complaints and concerns* about any violation of its code of conduct, including sexual exploitation, abuse and harassment, intimidation, discriminatory behaviours, as well as bullying and a range of non-sexual abuse of power. PIP will initiate rigorous inquiry and/or investigation of complaints that indicates a possible violation of this policy, PIP Code of Conduct and all PIP policies included in the Safeguarding Framework.
- *Sexual Exploitation and Abuse (hereinafter SEA) and any breach of the Child Safeguarding Policy are a violation of PIP's Code of Conduct and Safeguarding Policy* and constitute acts of gross misconduct and are therefore grounds for termination of employment

5. APPLICABILITY

All the policies included in this Framework, including the Safeguarding Policy are applicable for all employees and associates of PIP, including the management team, employees, staff working on other type of contracts, consultants, interns and volunteers[3] (hereinafter referred to as 'PIP staff'), as well as partner organisations[4] (hereinafter referred to as 'partners') working in the name of PIP (unless they have their own policies). Key principles of this Framework are also applicable to external suppliers in direct contact with PIP beneficiaries.
This Safeguarding Policy and all policies included in the Safeguarding Framework (PIP Key Policies) are applicable both inside and outside of office hours.

Partners
Adherence to and compliance – to the relevant extent – with this Safeguarding Policy, including the PIP Code of Conduct, must be included in every partnership agreement or contract. In case that a PIP partner organisation does not comply with the principles of this Policy, PIP reserves the right to withdraw funding and/or terminate any existing partnership agreements.

As PIP recognizes that partner organisations might have their own existing policies, codes or other instruments, this Policy and the PIP Code of Conduct does not seek to replace or nullify them.

[3] Volunteers above 18 which are in direct contact with PIP beneficiaries or represent PIP externally.
[4] In this context, "partner organisation working in the name of PIP" is an entity for which PIP provides financial or other resources, i.e. usually national or international NGO

Representatives of partner organisations must ensure that partner organisation staff and associates adhere to the key principles of ethical behaviour and standards of conduct, all necessary and relevant procedures within their organisation are set up and monitored, Complaints, Feedback and Response Mechanism (CFRM) for beneficiaries is established (if applicable) and that appropriate actions are taken when the standards of this Policy are not adhered to.

Unless PIP has resources to implement a more comprehensive package of actions, it is provided that, at a minimum, partner organisations working in the name of PIP will be:

- receiving and signing the Safeguarding Policy and all related policies of the Safeguarding Framework, including the Code of Conduct, Child Safeguarding, PSEA and Whistleblowing policies
- sharing their own policies
- implementing their own processes.

It is to be noted that PIP Safeguarding framework applies to partners in absence of their own policies – with the exception of the PIP Whistleblowing Policy, which applies only in situations that directly involve and/or affect PIP.

After gaining full capacity, PIP will:

- thoroughly assess partner organisations' policies and processes
- and support their enhancement or development in case it was identified that policies are lacking, or the existing ones could be strengthened.

Shall a breach of PIP policies be identified, it may be considered as a ground of termination of contract with partner organisations.

6. PIP COMMITMENTS

1. PIP will take all reasonable steps to protect PIP staff, beneficiaries and people who enter in contact with PIP from any harassment, abuse and exploitation of sexual and non-sexual nature potentially perpetrated by PIP staff and partners.
2. PIP is committed to protecting the rights and dignity of the PIP staff and maintain a dignified working environment, free of any potential harassment, abuse and exploitation.
3. PIP is committed to protecting the rights and dignity of beneficiaries and people who enter in contact with PIP and to delivering its programmes free of any potential harassment, abuse and exploitation.
4. PIP will set up and maintain adequate systems to prevent, report and respond to unethical or unacceptable behaviour in violation of the Code of Conduct and Safeguarding Framework Policies, including: systems and procedures to raise concerns about any PIP staff and partners' unethical or unacceptable behaviour (including a CFRM), and systems and procedures for responding to and investigation of potential violations.
5. PIP commits to ensure that all Staff, beneficiaries and people who enter in contact with PIP are aware of such systems.
6. PIP is committed to carry out a Safeguarding risk analysis for all PIP projects, and implement relevant adequate mitigating actions (see Annex 4 - Safeguarding Risk Analysis Guidance Tool).

7. STANDARDS OF CONDUCT AND FORMS OF UNACCEPTABLE BEHAVIOUR

PIP staff must treat anyone with respect and dignity.
As a consequence, PIP staff **must never**:

- discriminate on the basis of race, gender, religion, social status, colour, national or ethnic origin, age, disability, sexual orientation and others
- cause harm including physical, sexual, emotional abuse to any PIP staff, beneficiaries and people PIP enters in contact with
- engage in any humiliating, degrading or exploitative behaviour: any form of physical violence (unless in self-defence), emotional or psychological abuse, or neglect is unacceptable
- use inappropriate, violent or offensive language in oral or written form towards others
- engage in any commercially exploitative activities with children and adults including child labour or child/adults trafficking
- exchange money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour; this includes the exchange of assistance for sex
- engage in sexual activity with anyone under the age of 18 regardless of the age of the majority or age of consent locally; mistaken belief in the age of the child is not a defence
- engage in sexual relationships with beneficiaries of our programmes or their immediate relatives, as it is likely to be based on inherently unequal power dynamics
- sexually abuse or exploit any adult or children under the age of 18

For more details please refer to the PIP Code of Conduct, Child Safeguarding and Prevention from Sexual Exploitation and Abuse Policies.

Please note that this is applicable for all PIP or PIP partners' staff.
The above behaviours are considered serious violation of discipline, therefore as gross misconduct and may result in immediate dismissal.

PIP staff **must:**

- respect the rights and dignity of individuals, families and communities with whom we work.
- report any concerns or suspicions regarding safeguarding violations of the Code of Conduct or this policy by any PIP staff to the appropriate staff member through the appropriate channels as specified below and in the PIP Whistleblowing Policy
- make themselves aware of and behave respectfully towards local cultural and religious practices - however, these specifics can never be used as an excuse or a motive for inappropriate behaviour and PIP will not accept using respect for local culture as a justification for ignoring or supporting harmful practices
- contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy

8. MINIMUM STANDARD OF PREVENTION, REPORTING AND RESPONSE

Prevention

Recruitment and HR
PIP will ensure:

- a recruitment as safe as possible which will include a number of minimum measures:
  - Questions during interview and reference checks providing information about the candidate's history, understanding and adherence to PIP Safeguarding Framework and Code of Conduct (see Annex 1 – PIP Recruitment Guidelines).
  - A request for a Self-declaration form for all staff, volunteers and consultants (see Annex 2 – Self Declaration Form)

  for all PIP staff as follows:

	All staff and management team	Volunteers	Consultants
Ethical profiling during interviews	Yes	Yes	Yes
Criminal record check	Yes[5]	No	No
Reference checks	Yes	Only if possible	Yes
Self-declaration form	Yes	Yes	Yes

- all PIP staff are knowledgeable of (receive, read and sign) the Code of Conduct and all Safeguarding Framework's policies
- all staff receive training on safeguarding, including Child Safeguarding and SEA
- a system for internal reporting of incidents is in place, including for incidents involving PIP staff (please refer to the PIP Investigation Guidelines) in Annex 5 and staff is aware of it
- to try to achieve sufficient gender-balance in its office and field teams.

Partners
Please see all actions included in the Applicability section above.

Programmes
PIP will ensure that:

- beneficiaries and communities we work with are aware of PIP commitments and policies and know how to hold us to account for it (please refer to the PIP AAP framework for more details);
- feedback and complaints mechanisms are in place for communities and people we work with to report on breaches of such commitments and policies (please refer to the PIP AAP framework and to the CFRM procedure for more details);
- all projects will undertake a Safeguarding risk analysis (please refer to the Annex 4 – PIP Safeguarding Risk Analysis Guidance Tool for reference), so as to design and undertake programmes in a way that protects people from risk, through adequate mitigating measures. Particular attention will be placed on the risk of sexual exploitation and abuse (SEA);
- beneficiaries are selected and benefits are allocated in a transparent way and no individual PIP staff member can decide (or is perceived to be deciding) on the benefit allocation as a sole authority; ☺ reports of safeguarding concerns are followed up on promptly and according to due process.

Reporting

PIP will ensure that:

- safe, appropriate and accessible means of reporting safeguarding concerns are made available to staff and the communities we work with, are used, and clear training and accountabilities on handling complaints are in place, in particular to those related to Child Safeguarding and PSEA policies. Please refer to the Whistleblowing Policy included in this framework, or the channel described below. Please note that the reporting mechanism should not be a separate, parallel system to other complaints and feedback structures in a given area, but rather link to and build on existing structures to create one system for responding to feedback and complaints;
- selected staff members are knowledgeable on how to investigate complaints;
- any staff reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected as described in PIP's Whistleblowing Policy;

[5] Except for positions which do not enter in direct contact with beneficiaries.

- complaints from external sources such as members of the public, partners and official bodies are referred to the Protection mechanisms – including Child Protection – if necessary..

How to Report a Safeguarding Concern

PIP strives to create an environment in which victims and persons concerned about safeguarding feel free to report on it. PIP therefore requests all beneficiaries and PIP staff to report to PIP about any suspicion or disclosure of safeguarding concerns.

- For feedback and complaints that can come from beneficiary communities, PIP has in place a functional Community Feedback and Response Mechanism (CFRM).
- For cases of reporting from PIP staff, PIP utilizes the whistleblowing mechanism as described in the PIP Whistleblowing Policy which are as follows:
  - Telephone line: 00421 948 311 104
  - For Slovak programs the following email: niejemitojedno@clovekvohrozeni.sk
  - For non-Slovak programmes abroad to the following email: icare@peopleinneed.sk

All incidents must be recorded and managed in accordance with the relevant investigation procedures and standards as described in PIP Investigation Guidelines (Annex 5).

Response to a Safeguarding Concern

PIP will follow up safeguarding reports and concerns according to principles and obligations described in the Code of Conduct and other associated policies, in particular the PIP Whistleblowing policy, Community Feedback and Response Mechanism (CFRM) and PIP Investigation Guidelines (Annex 5).

The reaction to a complaint or report shall result in a confidential, sensitive, thorough and prompt inquiry. Such an initial inquiry may result in a formal investigation, or the reduction of the concern or in further action(s) outlined in the PIP Investigation Guidelines (Annex 5), which include disciplinary action up to dismissal and/or reporting to relevant authorities.

PIP will apply appropriate disciplinary measures to staff found in breach of this policy in line with PIP Code of Conduct.

If possible and appropriate, PIP will offer support to survivors of harm caused by PIP staff, regardless of whether a formal internal response is carried out (such as an inquiry and/or internal investigation). Decisions regarding support will be led by the survivor.

9. ROLES AND RESPONSIBILITIES

Creating a safe working environment at PIP is everyone's responsibility and failure to act on concerns or disclosures is not an option.

- *PIP Human Resources Department* holds the overall responsibility for this Framework and all its policies and their implementation. It is responsible for reviewing and updating this Framework and its policies annually and in line with the legislative and organisational developments and for its promotion amongst all persons to whom the Framework is applicable.
- *All PIP staff* (as defined under "Applicability" above) are required to adhere to this PIP Safeguarding Framework and all its related key policies – including the Code of Conduct, Safeguarding Policy, Child Safeguarding Policy, and Prevention of Sexual Exploitation and Abuse (PSEA) Policy at all times (i.e. including out of office hours). All PIP staff, and in particular the Management Team, Senior Managers and Country Directors, are also responsible for monitoring of application of this Framework.
- *All PIP staff* are obliged to report any suspicions of breach of the provisions in this Framework, including any of its related policies.

People in Peril
Child Safeguarding Policy

July 2023

Drafted by	Timea Stranska, Global Head of Programmes, Relief and Development Department
Approved	18 July 2023
Approved by	Andrea Najvirtova, Executive Director



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1. INTRODUCTION

People in Peril (PIP) recognises that especially in situations of poverty, humanitarian crisis and/or conflict, children can be extremely vulnerable. Therefore, PIP acknowledges as its fundamental duty to protect children engaged within its programmes and activities from any forms of abuse and exploitation that PIP staff and partners organisations[6] may commit.
The policy lays out the commitments made by PIP, and informs PIP staff of their responsibilities in relation to child safeguarding.

This policy must be read within the wider PIP Safeguarding framework which comprises of:

- PIP Code of Conduct
- PIP Safeguarding Policy
- PIP Prevention of Sexual Exploitation and Abuse (PSEA) Policy
- PIP Whistleblowing Policy

The policies above must be read in conjunction and are complemented by:

- PIP AAP Framework
- PIP Complaints, Feedback and Response Mechanism (CFRM)
- Supporting documents included as Annexes to these policies

PIP should – if capacity allows – strive to assist partner organisations to reinforce their own existing policies, codes or other instruments or if necessary to develop new ones.

2. OBJECTIVES OF THIS POLICY

By keeping in mind that behaviour and actions taken towards children need additional sensitivity, this Policy aims to complement the PIP Code of Conduct and highlight behaviour that should be observed and/or avoided when in direct contact with children.

By determining PIP's commitment to protect children and setting the key thresholds of desired or unacceptable behaviour, this Policy has the following objectives:

- to protect children engaged in PIP's programmes from all forms of abuse and exploitation
- to protect PIP staff from false or malicious allegations of misconduct
- to protect PIP's organisational integrity, mission, objectives, as well as reputation
- to lay out commitments and standards of PIP in regards to child safeguarding.

3. TERMINOLOGY

This policy is an integral part of PIP Safeguarding Framework – please refer to PIP Code of Conduct for all the relevant definitions. However, specific to this policy please note the following terminology used:

Child: a person under the age of eighteen (18) years as defined by the Convention on the Rights of the Child.
Child safeguarding: an activity or initiative designed to protect children from any form of harm, particularly arising from child abuse or neglect that PIP staff and partners may carry.
Child protection: an activity or initiative designed to protect children from any form of harm, particularly arising from child abuse or neglect by anyone external to PIP and PIP partners.

[6] As per Safeguarding Framework definition please note that this includes staff working on employment contracts, other type of contracts, consultants, interns and volunteers (hereinafter referred to as 'PIP staff'), as well as partner organisations (hereinafter referred to as 'partners') working in the name of PIP (unless they have their own policies)

Child abuse: all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust, or power. Within the broad definition of child maltreatment, five subtypes are distinguished:

Physical abuse is actual or likely physical injury to a child, such as hitting, kicking or shaking.

Emotional abuse is harm done by persistent or severe emotional ill-treatment or rejection, such as degrading punishments, threats, bullying or not giving care and affection, resulting in adverse effects on the behaviour and emotional development of a child or young person.

Neglect occurs when basic needs such as food, warmth and medical care are not met, resulting in the serious impairment of a child's or young person's health or development.

Sexual abuse occurs if a child or young person is pressurised or forced to take part in any kind of sexual activity. A child cannot consent to any form of sexual activity. Sexual abuse includes incest, rape and fondling, showing pornography or viewing pornographic images of children. Sexual abuse may involve siblings or other family members, or persons outside the family.

Commercial or other exploitation of a child refers to the use of the child in work or other activities for the benefit of others. This includes, but is not limited to, child labour (minimum acceptable age for employment or work is 15, while for work which might jeopardize the health, safety or moral (so called "worst forms of child labour") is 18) and child prostitution. These activities are detrimental to the child's physical or mental health, education, moral or social-emotional development.

4. POLICY STATEMENT

- *All people have the same right to freedom from abuse and exploitation.* PIP believes that everyone who come into contact with PIP should be treated with dignity, regardless of age, gender identity, disability, sexual orientation or ethnic origin or any other diversity, has the right to be protected from all forms of harm, abuse, neglect and exploitation. Therefore, PIP staff and partners (as defined under "Applicability" below) must never engage in any forms of humiliating, degrading, abusive, exploitative or other forms of unacceptable behaviour under any circumstances.
  PIP acknowledges that certain vulnerable groups – such as children, women, the elderly, disabled people and others – might be particularly at risk and must receive our greatest attention.
- *PIP does not tolerate any form* of sexual exploitation, abuse and harassment, intimidation, discriminatory behaviours, as well as bullying and a range of non-sexual abuse of power perpetrated by PIP staff and partners against any individual regardless of age, gender, sexuality, disability, religion or ethnic origin, or any other diversity.
- *PIN commits to do all the needful* for preventing its programs having any negative effects, such as sexual exploitation and abuse by PIP staff and partners against beneficiaries and members of the community.
- *PIP takes seriously all the complaints and concerns about any violation of its code of conduct,* including sexual exploitation, abuse and harassment, intimidation, discriminatory behaviours, as well as bullying and a range of non-sexual abuse of power. PIP will initiate rigorous inquiry and/or investigation of complaints that indicates a possible violation of this policy, PIP Code of Conduct and all PIP policies included in the Safeguarding Framework.
- *PIP upholds the rights and obligations of the United Nations Convention on the Rights of the Child* and so is dedicated to protect children engaged in its programmes from harm, exploitation and abuse.
- *Any breach of this policy is a violation of PIP's Code of Conduct and Safeguarding Framework and* constitutes an act of gross misconduct and may be therefore grounds for termination of employment.

5. APPLICABILITY

All the policies included in this Framework including the Child Safeguarding Policy, are applicable for all employees and associates of PIP, including the management team, employees, staff working on other type of contracts, consultants, interns and volunteers[7] (hereinafter referred to as 'PIP staff'), as well as partner organisations[8] (hereinafter referred to as 'partners') working in the name of PIP (unless they have their own policies). Key principles of this Framework are also applicable to external suppliers in direct contact with PIP beneficiaries.
The Child Safeguarding Policy is applicable both inside and outside of office hours.

Partners
Adherence to and compliance – to the relevant extent – with this Child Safeguarding Policy, including the PIP Code of Conduct, must be included in every partnership agreement or contract. In case that a PIP partner organisation does not comply with the principles of this Policy, PIP reserves the right to withdraw funding and/or terminate any existing partnership agreements.

As PIP recognizes that partner organisations might have their own existing Child Safeguarding Policy, codes or other instruments, this Policy and the PIP Code of Conduct does not seek to replace or nullify them. Representatives of partner organisations must ensure that partner organisation staff and associates adhere to the key principles of ethical behaviour and standards of conduct, all necessary and relevant procedures within their organisation are set up and monitored, Complaints, Feedback and Response Mechanism (CFRM) for beneficiaries is established (if applicable) and that appropriate actions are taken when the standards of this Policy are not adhered to.

Unless PIP has resources to implement a more comprehensive package of actions, it is provided that, at a minimum, partner organisations working in the name of PIP will be:

- receiving and signing the Child Safeguarding Policy and all related policies of the Safeguarding Framework, including the Code of Conduct, the Safeguarding, PSEA and Whistleblowing policies
- sharing their own policies
- implementing their own processes.

It is to be noted that PIP Safeguarding framework applies to partners in absence of their own policies – with the exception of the PIP Whistleblowing Policy, which applies only in situations that directly involve and/or affect PIP.

After gaining full capacity, PIP will:

- thoroughly assess partner organisations' policies and processes
- and support their enhancement or development in case it was identified that policies are lacking, or the existing ones could be strengthened.

Shall a breach of PIP policies be identified, it may be considered as a ground of termination of contract with partner organisations.

6. PIP COMMITMENTS

PIP is dedicated to fulfilling the above stated core principles through the implementation of the following commitments:

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[7] Volunteers above 18 which are in direct contact with PIP beneficiaries or represent PIP externally.

[8] In this context, "partner organisation working in the name of PIP" is an entity for which PIP provides financial or other resources, i.e. usually national or international NGO

- protecting the rights and dignity of children and taking all reasonable steps to protect children who enter in contact with PIP and partners staff from any harm, including harassment, abuse and exploitation of sexual and non-sexual nature potentially perpetrated by PIP staff.
- delivering its programmes free of any potential harassment, abuse and exploitation for children
- implementing and maintaining child safeguarding measures during recruitment, and ensuring staff is trained and made accountable for their behaviours towards children
- providing child friendly information about PIP expected and non-acceptable behaviour in projects with direct involvement with children
- having in place reporting and responding procedures for potential violation of this Policy, including a Community Feedback and Response Mechanism (CFRM). The PIP AAP Framework further details such commitment.
- PIP is committed to carry out a Safeguarding risk analysis for all PIP projects, and implement relevant adequate mitigating actions (please refer to the Annex 4 – PIP Safeguarding Risk Analysis Guidance Tool for reference).

7. STANDARDS OF CONDUCT AND FORMS OF UNACCEPTABLE BEHAVIOUR

PIP staff and partners **must**:

- respect the rights and dignity of all children we work with and treat children with dignity and respect regardless of ethnicity, race, gender, age, language, religion, political or other opinion, disability, or other status.
- behave appropriately; make sure that language is moderated in their presence and refrain from adult jokes or comments that may cause discomfort or offence.
- when working in the proximity of children be visible and ensure presence of another adult.
- in relation to child labour, PIP observes the Convention on the Rights of the Child, which stipulates that children's work should not jeopardize any of their other rights, including the right to education, or the right to relaxation and play. At the same time, "state parties shall provide a minimum age for admission to employment". PIP Country Programmes should therefore act in compliance with the Convention and relevant legislation in the given country.
- while implementing PIP programmes that may affect children, allow them to be engaged in designing the action, listen to them.
- when collecting data from children (during assessments, monitoring and evaluation, etc.) reduce the risk of potential harm by using culturally appropriate ways of communication, obtaining informed consent, ensuring confidentiality and not asking about painful experiences. If distressing data has to be obtained, try to use indirect data collection methods and be prepared to refer the distressed child to professional care.
- when getting and/or using children's images for visibility purposes (photographing or filming a child/children):
  - Comply with the standards as explained in the Code of Conduct
  - Ensure that the products (e.g. photographs, films, videos) present children in a dignified and respectful manner, with children being adequately clothed and not in poses that could be misleading or seen as sexually suggestive
  - When taking an image of a particular child for a specific purpose (medialization, advocacy, fundraising, etc.), explain how the product will be used and for that obtain legitimate consent from the child, whenever possible also from a parent or guardian of the child
  - Ensure that images of children availed for public use do not reveal any identifying information

- report any concerns or suspicions regarding child safeguarding violations of the Code of Conduct or this policy by any PIP staff member or associated personnel to the appropriate staff member through the appropriate channels as described below and in the PIP Whistleblowing Policy
- contribute to creating and maintaining an environment that prevents child safeguarding violations and promotes the implementation of the Child Safeguarding Policy.

As a consequence, PIP staff and associated personnel **must never:**

- subject any children to physical, emotional or psychological abuse, or neglect
- act in ways intended to shame, humiliate, belittle or degrade children, or otherwise perpetrate any form of emotional abuse, discriminate against, show differential treatment, or favour particular children to the exclusion of others.
- engage in any sexual activity or acts, including paying for sexual services or acts or child marriage with anyone under the age of 18 regardless of the age of the majority or age of consent locally. Mistaken belief in the age of the child is not a defence
- engage in any humiliating, degrading or exploitative behaviour for children: any form of physical violence (unless in self-defence), emotional or psychological abuse, or neglect is unacceptable
- discriminate children on the basis of race, gender, religion, social status, colour, national or ethnic origin, age, disability, sexual orientation and others
- use inappropriate, violent or offensive language or demonstrate behaviour that is harassing, abusive, demeaning, sexually provocative, or culturally insensitive towards children
- touch a child in an inappropriate or culturally insensitive manner (personnel in direct medical care positions are to follow International and/or local country industry best practice guidelines)
- engage children in any form of activity that is demeaning, offensive, sexually provocative, abusive or culturally inappropriate or insensitive
- engage in any commercially exploitative activities with children including child labour or trafficking
- ask for money, employment, goods or services for sexual activity with children. This includes any exchange of assistance that is due to them.
- physically assault or punish children
- do things for a child of a personal nature that they can do for themselves e.g. if PIP staff happens to be involved in any dressing, or undressing of outer clothing, or where there is physical contact of lifting or assisting a child to carry out particular activities. In situations with no other option, e.g. when helping a child with disability, these tasks should only be carried out with a full understanding of parents/guardian and of the children involved. There is a need to be responsive to a child's reactions and if a child is fully dependent, talk with them about what is going to be done and give them choices where possible.
- access child pornography or any inappropriate pictures of children through any medium
- invite unaccompanied children without their and parent's or guardian's approval into solitary places, unless they are at immediate risk of injury or in physical danger
- sleep in close proximity to unsupervised unrelated children
- hire children for domestic or other labour which is inappropriate given their age or developmental stage and which interferes with their time available for education and recreational activities, or which puts them at risk of injury

Please note that this is applicable for all PIP or PIP partners' staff. For more details please refer to PIP Code of conduct, Safeguarding Framework, and Prevention from Sexual Exploitation and Abuse Policies. The above behaviours are considered serious violation of discipline, therefore as gross misconduct and may result in immediate dismissal.

8. MINIMUM STANDARD OF PREVENTION, REPORTING AND RESPONSE

Prevention

Recruitment and HR
PIP and PIP programmes will ensure

- a recruitment as safe as possible (please refer to the details in the overall Safeguarding Framework), with the following minimum actions:
    - Questions during interview and reference checks providing information about the candidate's history, understanding and adherence to PIP Safeguarding Framework and Code of Conduct (see Annex 1 – PIP Recruitment Guidelines).
    - A request for a Self-declaration form for all staff, volunteers and consultants (see Annex 2 – Self Declaration Form)

- all staff are knowledgeable of (receive, read and sign) the Code of Conduct and Child Safeguarding policy
- all staff receive training on safeguarding, including Child Safeguarding and PSEA
- senior staff is sensitized and duly trained in order to handle child safeguarding related complaints
- to try to achieve sufficient gender-balance in its office and field teams

Programmes
PIP will ensure that:

- information about PIP commitments and policies (including Code of Conduct) and know-how to hold us accountable are provided to children, and that it is provided in a child-friendly way (please refer to the PIP AAP framework for more details)
- feedback and complaints mechanisms are in place and are maintained (please refer to the PIP AAP framework and to the CFRM for more details)
- reports of safeguarding concerns are followed up on promptly and according to due process

Child Safeguarding Risk Analysis – Prior to commencement of activities involving children, PIP will analyse potential risks to their programmes from a Safeguarding Framework Perspective (Please refer to the Annex 4 Safeguarding Risk Analysis Guidance Tool)), including those to children. Considering children-specific risks is mandatory in the analysis wherever children are part of programmes' target groups and are within the most vulnerable.
Activities can include training attended by children, working in hospitals or schools, data collections including discussions with children etc. In case risks to children were identified, the project team shall prepare an action plan that will address those risks with the aim to reduce them as much as possible. In case risks cannot be reduced to the required level and the project activities would cause harm to children, then the project team shall bring this issue to the country programme management that should decide whether further measures can be taken in order to address the risk(s). Activities that would harm children must not be carried out.

Reporting

Reporting of and responding to concerns and/or suspicions regarding breach of this policy within PIP programs is in line with PIP Safeguarding Framework and Policy. All incidents must be recorded and managed in accordance with the relevant investigation Guidelines (Annex 5), the Whistleblowing Policy and the CFRM. Please refer to the Whistleblowing Policy included in this framework.
PIP will ensure:

- safe, appropriate, accessible and if possible child friendly means of reporting safeguarding concerns are made available to children, are used and clear training and

accountabilities on handling complaints are in place, in particular to those related to Child Safeguarding and PSEA. This reporting mechanism should not be a separate, parallel system to other complaints and feedback structures in a given area, but rather link to and build on existing structures to create one system for responding to feedback and complaint;

- clarity on processes and accountabilities for handling child safeguarding related complaints is in place
- any staff reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected as described in PIP's Whistleblowing Policy.
- complaints from external sources such as members of the public, partners and official bodies are referred to Child protection mechanisms if required.

Response

PIP is committed to responding effectively, sensitively and swiftly to all allegations and suspicions of abuse. While PIP takes all allegations of child abuse extremely seriously, at the same time will employ the presumption of innocence while pending an official investigation of the incident.

As per PIP Investigation Guidelines (Annex 5) PIP will:

- investigate thoroughly all allegations, applying child specific principles for investigation process
- follow up child safeguarding reports and concerns according to principles and obligations described in the Code of Conduct and other associated policies, in particular PIP Whistleblowing policy, Community Feedback and Response Mechanism (CFRM) and Investigation Guidelines (Annex 5).
- ensure a confidential, sensitive, thorough and prompt investigation for all complaints or reports. Such an investigation either may result in the reduction of concern or in further action(s) outlined in the PIP Investigation Guidelines, which includes disciplinary action up to dismissal and/or reporting to relevant authorities.
- apply appropriate disciplinary measures to staff found in breach of policy in line with PIP Code of Conduct.
- If appropriate and available, PIP 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).

9. ROLES AND RESPONSIBILITIES

Creating a safe working environment at PIP is everyone's responsibility and failure to act on concerns or disclosures is not an option.

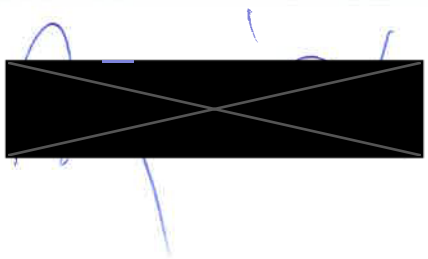
- *PIP Human Resources (HR) Department* holds the overall responsibility for this Policy and its implementation. It is responsible for reviewing and updating this Policy annually and in line with the legislative and organisational developments and for its promotion amongst all persons to whom the Policy is applicable.
- *All PIP staff* (as defined under "Applicability" above) are required to adhere to the PIP Safeguarding Framework and all its related key policies – including the Code of Conduct, Safeguarding Policy, Child Safeguarding Policy, and Prevention of Sexual Exploitation and Abuse (PSEA) Policy at all times (i.e. including out of office hours). All PIP staff, and in particular the Management Team, Senior Managers and Country Directors, are also responsible for monitoring of application of this Policy.
- *All PIP staff* are obliged to report any suspicions of breach of the provisions in this Policy, including any of its related policies.

People in Peril

Prevention of Sexual Exploitation and Abuse (PSEA) Policy

July 2023

Drafted by	Timea Stranska, Global Head of Programmes, Relief and Development Department
Approved	18 July 2023
Approved by	Andrea Najvirtova, Executive Director



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1. INTRODUCTION

People in Peril (PIP) is a non-governmental, non-profit organisation providing relief and development assistance worldwide, as well as educational activities and assistance in vulnerable communities in Slovakia.
PIP is committed to the best practice and quality of work of its staff and partners[9]. PIP also acknowledges as its fundamental duty to protect vulnerable people engaged within its programmes and activities from sexual exploitation and abuse.

This policy must be read within the wider PIP Safeguarding framework which comprises of:

- PIP Code of Conduct
- PIP Child Safeguarding policy
- PIP Safeguarding Policy
- PIP Whistleblowing policy

The policies above must be read in conjunction and are complemented by:

- PIP AAP Framework
- PIP Complaints, Feedback and Response Mechanism (CFRM)
- Supporting documents included as Annexes to these policies

PIP should – if capacity allows – strive to assist partner organisations to reinforce their own existing policies, codes or other instruments or if necessary to develop new ones.

2. OBJECTIVES OF THIS POLICY

By determining PIP's commitment to protect adults and children from all forms of sexual and non-sexual exploitation, abuse and harassment, intimidation, discriminatory behaviours, as well as bullying and a range of non-sexual abuse of power and setting the key thresholds of desired or unacceptable behaviour, this Policy has the following objectives:

- to protect children and adults engaged in PIP's programmes from all forms of sexual exploitation and Abuse (SEA)
- to protect PIP staff from all forms of sexual abuse and exploitation and any potential false or malicious allegations of misconduct
- to protect PIP's organisational integrity, mission, objectives, as well as reputation
- to lay out commitments and standards of PIP in regards to SEA

3. TERMINOLOGY

This policy is an integral part of PIP Safeguarding Framework – please refer to PIP Code of Conduct for all the relevant definitions.

Specifically relevant to SEA:
Sexual abuse – a threat of or actual physical intrusion of a sexual nature, whether by force, coercion or under unequal conditions. It includes sexual assault or sexual acts to which a person has not consented, could not consent, or was compelled to consent.
Sexual exploitation – any actual or attempted abuse of a position of vulnerability, differential power, or trust, to pressure or demand others to provide sexual favours, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of someone else.

[9] As per Safeguarding Framework definition please not that this includes staff working on other type of contracts, consultants, interns and volunteers (hereinafter referred to as 'PIP staff'), as well as partner organisations (hereinafter referred to as 'partners') working in the name of PIP (unless they have their own policies)

Sexual harassment – any form of unwanted verbal, non-verbal or physical conduct of a sexual nature. A single incident may constitute sexual harassment. Many forms of behaviour can constitute sexual harassment, including:

- Physical conduct of a sexual nature, including unwanted contact such as unnecessary touching, patting or pinching or brushing against another person's body, assault and coercive sexual intercourse.
- Verbal conduct of a sexual nature. This may include unwelcome sexual advances, propositions or pressure for sexual activity, continued suggestions for social activity outside the workplace after it has been made clear that such suggestions are unwelcome, unwanted or offensive flirtations, suggestive remarks, innuendos or lewd comments.
- Non-verbal conduct of a sexual nature. This may include the display of pornographic or sexually suggestive pictures, objects, written materials, posts on social media, emails or text messages. It may also include leering, whistling or making sexually suggestive gestures.
- Sex-based conduct. This may include conduct that denigrates or ridicules or is intimidating or physically abusive of an employee because of his or her sex, such as derogatory or degrading abuse or insults that are gender-related

4. POLICY STATEMENT

- *All people have the same right to freedom from abuse and exploitation.* PIP believes that everyone who come into contact with PIP should be treated with dignity, regardless of age, gender identity, disability, sexual orientation or ethnic origin or any other diversity, and has the right to be protected from all forms of harm, abuse, neglect and exploitation. Therefore, PIP staff and partners (as defined under "Applicability" below) must never engage in any forms of humiliating, degrading, abusive, exploitative or other forms of unacceptable behaviour under any circumstances.
- *PIP does not tolerate any form* of sexual exploitation, abuse and harassment, intimidation, discriminatory behaviours, as well as bullying and a range of non-sexual abuse of power perpetrated by PIP staff and partners against any individual regardless of age, gender, sexuality, disability, religion or ethnic origin, or any other diversity.
- *PIP commits to do all the needful* for preventing its programs having any negative effects, such as sexual exploitation and abuse by PIP staff and partners against beneficiaries and members of the community.
- *PIP takes seriously all the complaints and concerns* about any violation of its code of conduct, including sexual exploitation, abuse and harassment, intimidation, discriminatory behaviours, as well as bullying and a range of non-sexual abuse of power. PIP will initiate rigorous investigation of complaints that indicates a possible violation of this policy, PIP Code of Conduct and all PIP policies included in the Safeguarding Framework.
- *Sexual Exploitation and Abuse (hereinafter SEA) are a violation of PIP's Code of Conduct and Safeguarding Policy and* constitute acts of gross misconduct and therefore may be grounds for termination of employment.

5. APPLICABILITY

All the policies included in the Safeguarding Framework, including this PSEA Policy, are applicable for all employees and associates of PIP, including the management team, employees, staff working on other type of contracts, consultants, interns and volunteers[10]

[10] Volunteers above 18 which are in direct contact with PIP beneficiaries or represent PIP externally.

(hereinafter referred to as 'PIP staff'), as well as partner organisations[11] (hereinafter referred to as 'partners') working in the name of PIP (unless they have their own policies). Key principles of this Framework are also applicable to external suppliers in direct contact with PIP beneficiaries.
The PSEA Policy is applicable both inside and outside of office hours.

Partners

PIP is responsible to ensure that all the third parties, such as partners and external suppliers (in direct contact with beneficiaries) are committed to respect the principles included in the PSEA Policy, in addition to those explained in the Safeguarding Framework, including PIP Code of Conduct and Child Safeguarding Policy. Their acceptance by signature is a condition for undertaking any relation with PIP.

Therefore, adherence to and compliance – to the relevant extent – with this PSEA Policy, including the PIP Code of Conduct, must be included in every partnership agreement or contract. In case that a PIP partner organisation does not comply with the principles of this Policy, PIP reserves the right to withdraw funding and/or terminate any existing partnership agreements.

As PIP recognizes that partner organisations might have their own existing PSEA Policy, codes or other instruments, this Policy and the PIP Code of Conduct does not seek to replace or nullify them. Representatives of partner organisations must ensure that partner organisation staff and associates adhere to the key principles of ethical behaviour and standards of conduct, all necessary and relevant procedures within their organisation are set up and monitored, Complaints, Feedback and Response Mechanism (CFRM) for beneficiaries is established (if applicable) and that appropriate actions are taken when the standards of this Policy are not adhered to.

Unless PIP has resources to implement a more comprehensive package of actions, it is provided that, at a minimum, partner organisations working in the name of PIP will be:

- receiving and signing PSEA Policy and all related policies of the Safeguarding Framework, including the Code of Conduct, the Safeguarding, Child Safeguarding and Whistleblowing policies
- sharing their own policies
- implementing their own processes.

It is to be noted that PIP Safeguarding framework applies to partners in absence of their own policies – with the exception of the PIP Whistleblowing Policy, which applies only situations that directly involve and/or affect PIP.

After gaining full capacity, PIP will:

- thoroughly assess partner organisations' policies and processes
- and support their enhancement or development in case it was identified that policies are lacking, or the existing ones could be strengthened.

Shall a breach of PIP policies be identified, it may be considered as a ground of termination of contract with partner organisations.

[11] In this context, "partner organisation working in the name of PIP" is an entity for which PIP provides financial or other resources, i.e. usually national or international NGO

6. PIP COMMITMENTS

PIP is dedicated to fulfilling the above stated core principles through the implementation of the following commitments:

- taking all reasonable steps to protect PIP staff, beneficiaries and people who are entered in contact with from any harassment, abuse and exploitation of sexual and non-sexual nature potentially perpetrated by PIP staff and partners
- protecting the rights and dignity of the PIP staff and maintain a dignified working environment, free of any potential sexual harassment, abuse and exploitation
- protecting the rights and dignity of beneficiaries and people who enter in contact with PIP and to deliver its programmes free of any potential sexual harassment, abuse and exploitation
- delivering its programmes free of any potential sexual harassment, abuse and exploitation
- setting up and maintaining adequate systems to prevent, report and respond to unethical or unacceptable behaviour in violation of the Code of Conduct and this policy, including: systems and procedures to raise concerns about any PIP staff unethical or unacceptable behaviour are in place (including a CFRM), and systems and procedures for responding and investigation for potential SEA violations.
- ensuring that all Staff, beneficiaries and people who enter in contact with PIP are aware of such systems.
- carrying out a Safeguarding risk analysis as standard, which includes risks of SEA, for all PIP projects, and implement relevant adequate mitigating actions (see Annex 4 – PIP Safeguarding Risk Analysis Guidance Tool for reference).
- implementing and maintaining SEA safeguarding measures during recruitment, and ensuring staff is trained and made accountable for their behaviours
- providing information about PIP expected and non-acceptable behaviour in projects

7. STANDARDS OF CONDUCT AND FORMS OF UNACCEPTABLE BEHAVIOUR

PIP staff **must never:**

- engage in sexual activity with children (persons under the age of 18) regardless of the age of the majority or age of consent locally. Mistaken belief in the age of the child is not a defence.
- engage in sexual relationships between PIP Staff and beneficiary, as it is likely to be based on inherently unequal power dynamics and may undermine the credibility of PIP and its work.
- exchange money, employment, goods, or services for sex, including sexual favours or other forms of sexually humiliating, degrading or exploitative behaviour. This includes the exchange of assistance for sex.
- touch anyone in a sexually inappropriate or culturally insensitive manner (personnel in direct medical care positions are to follow International and/or local country industry best practice guidelines)
- access child pornography or any inappropriate pictures of children through any medium

PIP staff **must:**

- create and maintain an environment that prevents sexual exploitation and abuse and promotes the implementation of PIP Code of Conduct and related policies. PIP Managers at all levels have particular responsibilities to maintain an environment and develop and maintain systems, which prevent cases of SEA.
- report any concerns or suspicions regarding child safeguarding violations of the Code of Conduct or this policy by any PIP staff to the appropriate staff member through the appropriate channels (as stated below and in the PIP Whistleblowing Policy).

Please note that this is applicable for all PIP or PIP partners' staff. For more details please refer to PIP Code of Conduct, Safeguarding Framework, and the Child Safeguarding Policy.
The above behaviours are considered serious violation of discipline, therefore as gross misconduct and may result in immediate dismissal.

8. MINIMUM STANDARD OF PREVENTION, REPORTING AND RESPONSE

Prevention

Recruitment and HR
PIP will ensure:

- recruitment as safe as possible (please refer to the details in the overall Safeguarding Framework), with the following minimum actions:
    - Questions during interview and reference checks providing information about the candidate's history, understanding and adherence to PIP Safeguarding Framework and Code of Conduct (see Annex 1 – PIP Recruitment Guidelines).
    - A request for a Self-declaration form for all staff, volunteers and consultants (see Annex 2 – Self Declaration Form)
- that all staff are knowledgeable of (receive, read and sign) the Code of Conduct and all Safeguarding Framework's policies
- all staff receive training on safeguarding, including Child Safeguarding and SEA and that all managers are responsible for promoting awareness of this policy within their individual departments or teams
- to try to achieve a sufficient gender-balance in its office and field teams.

Programmes
PIP will:

- ensure that beneficiaries and communities we work with are aware of PIP commitments and policies and know how to hold us to account for it (please refer to the PIP AAP framework for more details)
- have in place accessible mechanisms for reporting sexual exploitation and abuse and PIP focal points for receiving complaints understanding how to discharge their duties (please refer to the incident reporting as described in the Whistleblowing Policy and the investigation guidelines in Annex 5). This reporting mechanism should not be a separate, parallel system to other complaints and feedback structures in a given area, but rather link to and build on existing structures to create one system for responding to feedback and complaint;
- engage with local communities and governments in prevention and response to sexual exploitation and abuse.
- all projects undertake a Safeguarding risk analysis including risks of SEA, so to design and a undertake programmes in a way that protect people from risk, through adequate mitigating measures (please refer to the Annex 4 - PIP Safeguarding Risk Analysis Guidance Tool for reference).

Partners
Please see all actions included in the Applicability section above for detailed actions on prevention.

Reporting

PIP will ensure that:

- safe, appropriate and accessible means of reporting safeguarding concerns are made available to staff and the communities we work with, are used and clear training and accountabilities on handling complaints are in place, in particular to those related to SEA
- adequate capacity is in place (staff, competences, financial resources) to handle investigations on SEA complaints
- any staff reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected as described in PIP's Whistleblowing Policy.
- complaints from external sources such as members of the public, partners and official bodies are referred to the Protection mechanisms - including Child Protection - if necessary.

Response

PIP will:

- follow up safeguarding reports and concerns according to principles and obligations described in the Code of Conduct and other associated policies, in particular PIP Whistleblowing policy, Community Feedback and Response Mechanism (CFRM) and PIP Investigation Guidelines Annex 5). The reaction to a complaint or report shall result in a confidential, sensitive, thorough and prompt investigation. Such an investigation either may result in the reduction of concern or in further action(s) outlined in the PIP Investigation guidelines, which includes disciplinary action up to dismissal and/or reporting to relevant authorities.
- process complaints of sexual exploitation and abuse in a timely manner, and to take appropriate disciplinary actions, including the immediate suspension of the alleged perpetrator from all the activities with a direct impact on beneficiaries and communities until the investigation is ended;
- upon the agreement with survivor, PIP will inform the appropriate authority which is responsible for conducting investigations for sexual exploitation and abuse allegations in respect of national and foreign legislation;
- if appropriate and available, 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), in form of psychosocial counselling, medical treatment, legal assistance to any victims of sexual exploitation and abuse. Decisions regarding support will be led by the survivor.
- will fulfil the right of complainant and survivor to receive feedback on the development and outcome of their case.

9. ROLES AND RESPONSIBILITIES

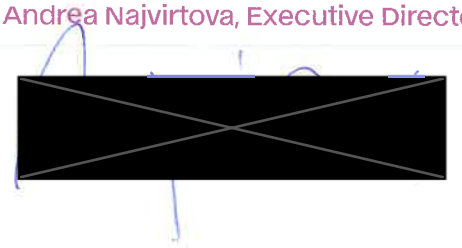
Creating a safe working environment at PIP is everyone's responsibility and failure to act on concerns or disclosures relating to sexual harassment, abuse and exploitation is not an option.

- *PIP Human Resources (HR) Department* holds the overall responsibility for this Policy and its implementation. It is responsible for reviewing and updating this Policy annually and in line with the legislative and organisational developments and for its promotion amongst all persons to whom the Policy is applicable.
- *All PIP staff* (as defined under "Applicability" above) are required to adhere to the PIP Safeguarding Framework and all its related key policies – including the Code of Conduct, Safeguarding Policy, Child Safeguarding Policy, and Prevention of Sexual Exploitation and Abuse (PSEA) Policy at all times (i.e. including out of office hours). All PIP staff, and in particular the Management Team, Senior Managers and Country Directors, are also responsible for monitoring of application of this Policy.
- *All PIP staff* are obliged to report any suspicions of sexual exploitation, abuse or harassment of others.

People in Peril
Whistleblowing Policy

July 2023

Drafted by	Timea Stranska, Global Head of Programmes, Relief and Development Department
Approved	18 July 2023
Approved by	Andrea Najvirtova, Executive Director



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1. INTRODUCTION

All People in Peril (PIP) staff have the *duty to report* any known or suspected cases of abuse, exploitation, harassment or other forms of unacceptable behaviour, which are in direct breach of the PIP Code of Conduct and the PIP Key Policies. The failure to report any breach of the above-mentioned policies causes the development of dangerous behaviour contrary to PIP principles and values and the victimization of innocent people.

The Whistleblowing Policy is an internationally recognized procedure enabling any staff to be protected while raising concerns around unethical, unacceptable, dangerous, illegal practices.

All complaints or concerns must be brought to the attention of the relevant persons specified below using the tools and channels described below. In order to protect the rights of PIP staff and to maintain a dignified working environment free of any potential harassment, abuse and exploitation, PIP management has the *duty to investigate* any complaint or concern raised by PIP employees through the channels described below.

This Policy should be read within the wider PIP Safeguarding Framework which comprises:

- PIP Code of Conduct, including Anti-Fraud and Anti-Corruption principles
- PIP Safeguarding Policy
- PIP Child Safeguarding Policy
- PIP Prevention of Sexual Exploitation and Abuse (PSEA) Policy

2. OBJECTIVES OF THIS POLICY

This Policy is based on PIP open-door approach and the effort to solve – rather than conceal – different forms of unacceptable behaviour. Whistleblowing is not seen as an act of "snitching and informing", but as an act of personal courage based on loyalty to the organization and its ethical principles.
This Policy enables PIP staff to raise their serious concerns internally directly to the level of top management and to support and protect those individuals who believe they have witnessed serious malpractices.
Ultimately, a safeguarding policy cultivates a culture of integrity.
This Policy will be actively promoted by PIP management and it will create an inseparable part of every employment contract.

The scope of this Policy is aimed namely on cases of:

- Abuse, exploitation or harassment
- Financial malpractice, corruption or fraud
- Failure to comply with legal obligations or statutes
- Dangers to the health, safety, security or the environment
- Criminal activity
- Improper, unethical or unacceptable behaviour in conflict with the PIP Code of Conduct and other policies on the organizational or department level
- Attempts to conceal any of these

3. APPLICABILITY

All policies included in the Safeguarding Framework, including this Whistleblowing Policy, are obligatory for all employees and associates of PIP, including the management team,

employees, staff working on other type of contracts, consultants, interns and volunteers[12] (hereinafter referred to as 'PIP staff'), as well as partner organisations[13] working in the name of PIP, unless they have their own policies (hereinafter referred to as 'partners').

What can be reported

Any serious concerns or suspected cases of abuse, exploitation, harassment, fraud or suspicion of it, damage to PIP assets or other forms of unethical, dangerous or unacceptable behaviour, which are in direct breach of the PIP Code of Conduct and the PIP Key Policies or that:

- make you feel uncomfortable in terms of known standards;
- are not in keeping with PIP policies;
- fall below established standards of practice;
- or are improper behaviour.

4. BASIC PRINCIPLES

Protection

PIP guarantees the protection of the complainant, the subject of the complaint and any other person assisting the investigation against any form of intimidation, threats, reprisal or retaliation resulting from the alleged incident.

Confidentiality

PIP treats all such complaints or disclosures in a confidential and sensitive manner and the identity of the complainant will be kept confidential as long as it does not hinder the resulting investigation.

Anonymous allegation

This Policy encourages individuals to put their name under any complaint or disclosure. As the anonymous complaints or disclosures are less credible and the standard procedure described below cannot be fully followed, the seriousness and credibility of the issue will be always taken into account.

Untrue allegations

If an individual makes an allegation in good faith, which is not confirmed by the subsequent investigation, no action will be taken. However, if an individual makes an intentionally malicious or false accusation or otherwise misuses the below described channels, he/she may face disciplinary action.

Due process

The rights of all parties involved in an internal administrative investigation will be respected and they will be at all times treated with respect and dignity. All employees who are the subject of an investigation will be given:

- full notice of any formal allegation made against them
- the explanation of the investigation process
- the opportunity to explain and/or reply to any formal allegation made against them before any disciplinary action will be taken
- the presumption of innocence throughout the investigation
- the right to a full, fair, impartial, thorough and objective investigation of the allegation(s) without undue delay
- confidentiality in the conduct of the investigation

Any intentionally false or malicious statements or accusations against another staff member or third party, lack of cooperation (including breach of confidentiality) or an undue interference with the investigation will be considered as gross misconduct and will result in disciplinary or other appropriate action.

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[12] Volunteers above age 18 who are in direct contact with PIP beneficiaries or represent PIP externally

[13] In this context, "partner organisation working in the name of PIP" is an entity for which PIP provides financial or other resources, i.e. usually a national or international NGO

5. COMPLAINTS / DISCLOSURE PROCEDURES

Disclosure channel for PIP beneficiaries
PIP acknowledges that enabling beneficiaries and project stakeholders to seek and receive response for grievances and alleged harm is a critical aspect of accountability. Thus, PIP beneficiaries are encouraged to share their complaints, comments and feedback through the Community, Feedback and Response Mechanism (CFRM). This formal mechanism, described in the CFRM Policy, provides a safe, accessible and effective channel for PIP's beneficiaries and project stakeholders to raise complaints and feedback and for a response or redress to be given and enables PIP to understand the project from the beneficiaries' perspective.
In case the complaint or disclosure of a malpractice does not originate from PIP staff (i.e. coming from a beneficiary, PIP associate, etc.), the PIP staff member receiving the complaint is obliged to act as the complainant and the information must be passed as soon as possible to their line manager or the appropiate CFRM channels.
Such information must not be intentionally concealed.

Disclosure channel for PIP Staff
All complaints and disclosures **related to PIP Code of Conduct or Safeguarding Framework** should be addressed and in the following ways:

- **Line manager**
  For sexual abuse and exploitation cases it is recommended to consider a same gender person, or a female for disclosure.
  If the person submitting the complaint does not feel confortable in addressing their line manager, they can refer to the higher level up in PIP structure, directly to HR, or via the provided channels (see below).
- **Email:** for Slovak programs: niejemitojedno@clovekvohrozeni.sk,
  for country programmes abroad icare@peopleinneed.sk
- **Telephone number:** +421 948 311 104

Any complaint and disclosure regarding **fraud** should be sent to directly to any member of the PIP Management Team.

- Complaints against the PIP Director should be directed to the Governing Board.
- At the country programmes abroad, complaints from international employees should be directed to the head of the relevant PIP department at headquarters (HQ) level (usually the Head of Relief and Development Department).
- At the country programmes abroad, complaints from national staff should be directed to the respective PIP Country Director or Head of Base, unless the complaint or disclosure is against or somehow connected with him/her. In such cases, the complaint should be passed to the head of the respective PIP department at HQ level.
- In justifiable cases, the complainant has the right to bypass the described routes and take the complaint directly to the PIP Director.
- If none of the above routes is suitable or accessible, the complainant may approach the PIP Financial Director.

6. INVESTIGATING

All PIP Code of Conduct and Safeguarding related investigation will be carried out in accordance with the PIP Investigation Guidelines (Annex 5), including provisions as to who is entitled to investigate on the cases.