



БЛАГОДІЙНА ОРГАНІЗАЦІЯ «БЛАГОДІЙНИЙ ФОНД «СТАБІЛІЗАЦІЙНІ СЛУЖБИ»  
SERVICES» CHARITABLE ORGANIZATION «CHARITY FOUNDATION  
«STABILIZATION SUPPORT SERVICES» 04053, Україна, м. Київ, вул. Січових Стрільців, 1-5  
ЄДРПОУ 40567253, р/р 26008500242960 банк ПАТ «Креді Агроколь Банк», МФО 300614

## Safeguarding Policy

Document Information	
Document Version	1.0
Applies to those who work on our behalf	<i>Employees, consultants, volunteers</i>
Prepared by	Toro Solutions
Approved by	Dermot Hamilton
Issued date	2020
Review date	Within two years of the issue date





## Contents

<b>1. Introduction</b> .....	3
1.1. <i>Accountability Statement</i> .....	3
1.2. <i>Non-Compliance Statement</i> .....	3
1.3. <i>Policy Review</i> .....	3
<b>2. Policy</b> .....	3
2.1. <i>Risk Appetite</i> .....	3
2.2. <i>Risk Ratings</i> .....	4
2.3. <i>Security Strategies</i> .....	4
2.4. <i>Roles and Responsibilities</i> .....	5
2.5. <i>Duty Bearer Commitments</i> .....	6
2.6. <i>Incident Management</i> .....	7
<b>3. Risk Management Methodology</b> .....	8
3.1. <i>Phase 1: Context</i> .....	9
3.2. <i>Phase 2: Assessment</i> .....	9
3.3. <i>Phase 3: Control</i> .....	9
3.4. <i>Phase 4: Monitoring</i> .....	10



## **1. Introduction**

All environments present inherent threats. Wherever we are as individuals, we will be at some level of risk. Political, socio-economic and other factors, combined with our mission and activities, contribute to shifting dynamics that may give rise to violence, insecurity and disorder.

These dynamics may directly impact on the physical and mental health of those working on our behalf. This policy and other relevant documents have been designed to minimise the risks to these people, as well to protect our organisation's reputation, finances and sustainability.

### **1.1. Accountability Statement**

We take the safety, security and wellbeing of those working on our behalf very seriously and fully accept our duty to provide a reasonable standard of care to them, take reasonable steps to mitigate foreseeable harm and ensure appropriate mechanisms are in place to respond to incidents.

### **1.2. Non-Compliance Statement**

Any deliberate breach of this policy, or any other relevant documents or practices, that govern and regulate risk is considered a disciplinary matter and may result in disciplinary action, up to and including termination of contract, in a manner that follows our disciplinary procedures and the required legal framework.

However, we will also take a discussion-first approach so that we provide a suitable space to assess the appropriateness of safety and security measures and identify improvements to our policy and practice.

### **1.3. Policy Review**

To meet with best practice and safety and security risk management developments and any changes in applicable law, we agree to review this policy, and any other relevant documents or practices that govern and regulate risk, every two years as a minimum.

## **2. Policy**

### **2.1. Risk Appetite**

#### **2.1.1. Risk Appetite Statement**

Our mission, work and the locations we pursue them in inherently involve exposure to insecurity and potential violence. This means that the health and wellbeing of those who work on our behalf may be negatively affected. In response, we seek to reduce the likelihood and impact of these risks by actively managing them through a systematic process. We do not engage in



#### 1.4. Policy Review

To meet with best practice and ethical developments and any changes in applicable law, we agree to review this policy, and any other relevant documents or practices that govern and regulate safeguarding, every two years as a minimum.

#### 1.5. Over-reaching Principles

This policy is underpinned by over-reaching principles that are informed by the United Nations Convention of the Rights of the Child (UNCRC) and safeguarding best practices which aim to ensure that we are skilled, confident, understand, and accept how to meet our safeguarding responsibilities.

## 2. Policy

### 2.1. Governance, Accountability, Roles and Responsibilities

The following table outlines the governance, roles and responsibilities that relate to this policy:

Role	Responsibility	Allocated to
Safeguarding Lead on Board of Trustees	Responsible and accountable for safeguarding standards including ensuring the organisation has: <ol style="list-style-type: none"> <li>1. Appropriate policies and procedures in place that are compliant with good practice guidance and legislation</li> <li>2. A clear reporting and investigation system</li> <li>3. Safeguarding risk management processes including downstream partners</li> <li>4. A system for conducting periodic reviews of management of safeguarding issues internally and externally as well as review of safeguarding policies, procedures and practice</li> </ol>	Director
Safeguarding Lead at CEO/Executive level	The Safeguarding Lead has ultimate responsibility and accountability for the safeguarding policy and framework. They are responsible for its management and ensure regular review of safeguarding at a senior level.	Director
Safeguarding Officer	The Safeguarding Officer is a senior member of staff who is responsible for organisation-level delivery of strategy and updates into the board. They will: <ol style="list-style-type: none"> <li>1. Respond to questions regarding this policy</li> <li>2. Participate in safeguarding investigations as appropriate</li> <li>3. Assess safeguarding risks within the organisation, including programmes and projects</li> <li>4. Maintaining the Safeguarding Incident Database</li> <li>5. In consultation, making formal referrals to statutory agencies (i.e. police) or other organisations as appropriate</li> </ol> Conduct regular reviews of safeguarding incidents and provide both statistical and qualitative reports to the Safeguarding Lead at management and board levels	Operations Director



Safeguarding Focal Points	Safeguarding Focal points: 1. Ensure that safeguarding referral pathways are up to date 2. Ensure that all employees, consultants, are aware of the Safeguarding Policy, have received training, and have signed the Code of Conduct 3. Receive any safeguarding reports and pass them to the Safeguarding Committee	HR Manager
Safeguarding Committee	Receive reports and conduct decision making and full and fair investigations into reported concerns as needed. The Safeguarding Committee may be comprised of <ul style="list-style-type: none"><li>• Safeguarding Lead/Officer</li><li>• A Safeguarding Focal Point</li><li>• HR manager</li><li>• Safeguarding adviser (or equivalent) if needed</li></ul>	Director Operations Director HR Manager
Line Managers	Line Managers have responsibility for providing support in implementing this policy. This includes ensuring that the policy framework is actioned and that all staff are aware of their roles and responsibilities under the Policy.	Programme Managers
Safeguarding Framework Implementors	All employees, consultants, volunteers are required to adhere to this Policy and Code of Conduct at all times. All employees, consultants, volunteers are also required to reporting any safeguarding concerns in alignment with the Safeguarding Reporting procedure. Failure to report is a breach of the Policy and could lead to disciplinary action being taken.	All employees, consultants, volunteers

## 2.2. Whistleblowing

As outlined in the Whistleblowing Policy we encourage all individuals to raise any concerns that they may have about the conduct of others who work on our behalf or the way in which the organisation is run. Additionally, as a supplier to the UK Government we are bound to comply with UK Government standards in terms of whistleblowing. All safeguarding concerns should be reported through the safeguarding reporting channels unless it is honestly believed it is in the public interest to use the whistleblowing process.

### Reporting

Those who have concerns or knowledge of serious malpractice should speak to their line or contracting manager, unless there are specific reasons why this is not reasonable, (e.g. the person is the subject of the concern, or the discloser wishes to remain anonymous). This may be completed verbally or in writing. If in doubt, support and assistance can be sought from the Senior Person.

A report should only be considered when and if the above reporting lines are not available or not appropriate, or the individual is not satisfied that their suspicions have been properly dealt with.



### 2.3. Human Resources

CO "CF "Stabilization Support Services" have developed robust procedures to ensure that safeguarding is at the heart of all recruitment and induction. Recruitment and selection guidelines integrate safeguarding considerations into all stages of the process. This includes:

**Person Profile/Job Description:** We ensure that the skills and knowledge required to work safely are included in within the person profile and/or job descriptions.

**Job Advertisement:** A clear statement on our commitment to safeguarding is included.

**Interviews:** Interviews include at least one question on safeguarding.

**Reference Checks:** Reference checks include a question related to safeguarding. A pre-employment questionnaire is also completed where potential employees detail any previous workplace investigations, including safeguarding.

**Proof of Identification/Qualifications:** Candidates for selection will be required to verify their identity as well as qualifications.

**DBS and Security Clearance:** All positions are risk assessed and will require full security clearance and background check as needed. These checks must be in place prior to working with children and/or at-risk adults.

**Code of Conduct:** All staff must sign the Code of Conduct.

**Probationary Period:** During the probationary period, staff will be monitored for any safeguarding concerns.

**Induction:** All newly hired staff will be briefed and oriented to the Safeguarding Policy.

**Training:** In order for us to meet our commitments to safeguarding, it is essential that everyone associated with the organisation has clear education and training. We will ensure that all employees, consultants, volunteers as well as Trustees have completed safeguarding training, receive annual safeguarding refresher training, and are aware of the Safeguarding Framework. The Safeguarding Focal Points, Safeguarding Officer, Trustee Safeguarding Lead, and Safeguarding Committee will receive specialised training in their roles and responsibilities. We will also ensure that Partners have met their due diligence safeguarding requirements, including training.

The Human Resources Checklist in the Resources section contains a full list of steps that need to be taken before, during and after employment cycle.

### 2.4. Risk Management

#### Assessing Risk

We will conduct safeguarding risk assessments in all areas of work. As per safeguarding standards, the key elements of risk assessments will be:

1. Establishing the context, scope and setting where the work is being conducted.
2. Identifying the potential impact on, or contact with children and/or at-risk adults
3. Identifying and analysing the potential risks of that impact or contact.
4. Evaluating the risks in terms of likelihood and the seriousness of impact.
5. Implementing strategies to minimise or prevent risk.
6. Reviewing and revising risks and preventative measures.
7. Communicating and consulting the risks and preventative measures.

#### Minimizing and Addressing Risks

The types of risks that we may face vary according to the type of work that is being carried out and risk will be monitored and assessed on a case by case basis.

In general, strategies to prevent or minimize risk will include:

1. Ensure that safeguarding is embedded within the organisational culture.



2. Clear roles and responsibilities in relationship to safeguarding are established at all levels.
3. Capacity building and training on safeguarding is delivered to all staff.

A Safeguarding Risk Assessment tool is included in the Resources section. Risk assessment information is then entered into the Risk Register.

### **Working with Partners**

We are committed to ensuring that all partners that we work with also adhere to safeguarding standards and will conduct a safeguarding due diligence assessment with partners as per the Partner Due Diligence Assessment Tool is in the Resources Section.

### **2.5. Code of Conduct**

We are committed to ensuring that we safeguard employees, consultants, volunteers as well as children and at-risk adults that they may come into contact with through the course of their work. In each of these categories, there are specific commitments that we adhere to including:

#### **Safeguarding Children**

A child is defined as anyone under the age of 18 years. While local laws, customs and practices may define a child differently, international best practice is followed in relationship to safeguarding. This ensures that children are protected and that their inherent vulnerability as a child is respected.

Safeguarding children is the process of taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially at-risk adults and children, from that harm; and to respond appropriately when harm does occur. The full definitions of child abuse are outlined in the Definitions.

Safeguarding applies consistently and without exception across all levels of our work. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialise. Our systems are survivor-centred and protect those accused until proven guilty. Safeguarding puts beneficiaries and affected persons at the centre of all we do.

#### **Safeguarding At-risk Adults**

An at-risk adult is defined as:

- Those aged over 18 years and who identify themselves as unable to take care of themselves/ protect themselves from harm or exploitation; or
- Who, due to their gender, mental or physical health, disability, ethnicity, religious identity, sexual orientation, economic or social status, or as a result of disasters and conflicts, are deemed to be at risk from harm or exploitation.

We believe that all at-risk adults have a right to live their lives free from harm including abuse, neglect and exploitation and we will not tolerate employees, consultants, volunteers engaging in any sort of behaviour that puts others at risk.

#### **Protection from Sexual Exploitation and Abuse (PSEA)**

Sexual exploitation is any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. We follow the principles of PSEA (Protection from Sexual Exploitation and Abuse) – the term used by the UN and NGO community to refer to measures taken to protect at-risk people from sexual exploitation and abuse by their own staff and associated personnel.



We believe that all people have a right to live their lives free from sexual exploitation and abuse and recognise that there can be unequal power dynamics across the organisation and with those we may come into contact with during our work. To this end, we must be aware that there is the potential for some employees, consultants, volunteers to use their position of power for personal gain.

We will not tolerate employees, consultants, volunteers engaging in any form of sexual harassment, sexual abuse, sexual exploitation or any other form of abuse.

### **Protection from Bullying, Harassment, Sexual Harassment, Discrimination and Abuse of Power**

We are also committed to ensuring that employees, consultants, volunteers are protected from any form of bullying, harassment, sexual harassment, discrimination and abuse of power. All forms of harassment, sexual harassment, bullying, discrimination of any type, sexual violence and sexual exploitation are prohibited. The definitions in the Definitions section will clarify the terms.

### **Code of Conduct**

The information below is fully outlined in the Code of Conduct in the resources section; however, it is repeated in the Safeguarding Policy to ensure that employees, consultants, volunteers are aware of their responsibilities under this policy and will sign that they agree to abide by the code of conduct.

#### **All employees, consultants, volunteers AGREE TO:**

1. Prioritise the safety and wellbeing of children and at-risk adults at all times.
2. Treat all children, at-risk adults, and everyone you work with, with respect.
3. Always behave appropriately and use appropriate language.
4. Always act professionally and ensure all contact with children and at-risk adults is essential to the programme / event / activity / project you are working on.
5. Recognise that special caution is required in moments when you are discussing sensitive issues with children and at-risk adults.
6. Respect a child and an at-risk adult's right to privacy and maintain confidentiality when required.
7. Help children and at-risk adults to take part in decision making and maintain a culture of communication.
8. Use non-violent and positive behaviour at all times.
9. Inform all of their right to report any concerning situations.
10. Plan activities in a way to minimise the risk of harm.
11. Never abuse and/or exploit anyone or act/behave in any way that places anyone at risk of harm.
12. Report any safeguarding concerns.
13. Respond to a child or at-risk adult who may have been abused or exploited in accordance with this safeguarding policy.
14. Cooperate fully and confidentially in any investigation of concerns or allegations of safeguarding.
15. Contribute to building an environment where all are respected and encouraged to discuss their concerns and rights.



16. Always treat children and at-risk adults in a manner that is respectful of their rights, integrity, and dignity, considers their best interests, and does not expose them to, or place them at risk of, harm.
17. Never make any contact with a child, at-risk adult or family members associated with CO "CF "Stabilization Support Services" work that is not supervised by another member of staff. Such contact may include but is not limited to visits and any form of communication via social media, emails and letters.
18. Only arrange visits to meet with children and at-risk adults in a protected space, where you are accompanied by another adult.

**All employees, consultants, volunteers WILL NEVER:**

1. Give out your personal contact details or friend / follow children or at-risk adults on social networking sites.
2. Show favoritism or prejudice / discriminate against children or at-risk adults.
3. Take sole responsibility for a child or at-risk adult as part of your work at CO "CF "Stabilization Support Services".
4. Make suggestive, derogatory remarks or gestures in front of children or at-risk adults.
5. Engage in any form of sexual relations with anyone under 18 years old, regardless of the legal age of sexual consent, the law and local customs. Mistaken belief in the age of the child is not a defense.
6. Exchange money, employment, goods or services for sexual favors, or subject the child or at-risk adult to any other kind of humiliating, degrading or abusive behavior.
7. Touch, abuse in any way children or at-risk adults, or use language, or make suggestions in an inappropriate manner, to provoke, harass, or degrade the child/at-risk adult.
8. Exploit or discriminate.
9. Be under the influence of drugs or alcohol while at work.
10. Work with or transport a child or at-risk adult alone without the authorization of a manager unless absolutely necessary for the safety of the child/at-risk adult.
11. Take part in any inappropriate physical, verbal or sexual behavior.
12. Allow concerns, allegations, or suspicions of safeguarding to go unreported.
13. Bully, harass, discriminate against or abuse their power with another employee, independent consultant, freelancer or other who work on our behalf.
14. Use IT equipment inappropriately including downloading, viewing or distributing any pornographic material, especially materials related to child and at-risk adults.

**Reporting  
Prevention**

It is our goal to prevent any safeguarding concerns from developing and this is achieved through having a comprehensive Policy, Procedures that are adhered to, and People who are aware of their roles and responsibilities, the resources available to them, and are trained in how to create a robust safeguarding culture.

**Reporting: How to Make a Complaint or Raise a Concern**

Anyone can raise a concern or make a complaint about something they have experienced or witnessed.



If you have a safeguarding concern, report it immediately to a Safeguarding Focal Point. A safeguarding concern is anything in violation of this policy or any safeguarding concern you have in relationship a child, at-risk adult or employees, consultants, volunteers.

### **Reporting: Handling Complaints and Concerns**

We are committed to responding to all complaints and concerns and in the event that a safeguarding complaint or concern arises, the following Procedure will be used:

1. **Report Made:** The Safeguarding Focal Point will receive the complaint/concern and pass the report onto the Safeguarding Committee within 24 hours of receiving the report. The Safeguarding Committee will begin decision make and initiate any investigations and follow-up related to violations of this policy within 72 hours.
2. **Investigation Process:** The Safeguarding Committee will identify how investigations should be managed systematically in line with the safeguarding policy and will gather evidence and interview relevant parties to establish the probable facts. All concerns and reports will be taken seriously, investigated, and addressed immediately.
3. **Disciplinary Process:** As required, all disciplinary procedures will be followed, which may result in disciplinary action, termination of employment and/or referral to the appropriate law enforcement agency or legal authority.
4. If a legitimate concern about suspected safeguarding is raised, which proves to be unfounded on investigation, no action will be taken against the reporter. However, appropriate disciplinary action, up to an including termination of employment, will be applied in cases of false and malicious accusations of safeguarding.
5. **Incident Review:** Once the incident is closed, we will then make recommendations on improving the policies and practices that may have enabled the breach of safeguarding to occur, as well as on how to rebuild trust, and on what help should be provided to minimise the harm to survivors.
6. **Safeguarding Incident Database:** All reports will be logged in the safeguarding incident database and any records will be maintained in a secure location in a manner consistent with applicable data protection guidelines.

The Safeguarding Reporting Procedures document fully outlines the steps in reporting, investigation and follow-up.

### **Whistleblowing**

As outlined, we maintain a Whistleblowing line where concerns may be submitted anonymously for investigation. All disclosures will be treated in confidence.

### **Confidentiality**

Any employee, consultant, volunteer who raises safeguarding concerns will be protected as far as possible from victimisation, or any other detrimental treatment, if they come forward with serious concerns, provided that they have followed the procedures, and provided that concerns are raised in good faith.

The subject of the complaint and all witnesses must co-operate fully and openly with internal and statutory investigations and hearings. Their confidentiality will be protected, and information which could identify them will be shared on a 'need to know' basis only. We will take strong action against anyone who knowingly broadcasts confidential information about the case.

### **Retaliation against Complainants, Survivors and Witnesses**



We will take action against anyone who retaliates against a complainant, survivor or witness and the employee, consultant, volunteer will be subject to disciplinary action, up to and including termination of employment.

### **Survivor Support**

Support will be offered to survivors which can include specialist counselling and other specialist and appropriate support as needed. Survivors can choose if and when they would like to take up the support available to them.

## **2.6. Safeguarding Definitions**

### **Safeguarding**

Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially at-risk adults and children, from that harm; and to respond appropriately when harm does occur. It also means protecting staff from any forms of bullying, harassment, sexual harassment, discrimination and abuse of power.

### **Child Safeguarding**

#### **Child**

A person below the age of 18.

**Child abuse** is defined as all forms of physical abuse, emotional ill-treatment, sexual abuse and exploitation, neglect or negligent treatment, commercial or other exploitation of a child, and includes any actions that result in actual or potential harm to a child. Abuse can happen anywhere and at any time, but research shows that the perpetrators of abuse are likely to be known and trusted by the child. The most commonly defined types are:

**Physical:** Violence towards or deliberate injury of a child.

**Neglect:** Persistent failure to meet a child's basic physical and psychological needs.

**Sexual:** Using a child for sexual stimulation or gratification.

**Emotional:** Behavior which attacks a child's self-esteem.

**Child sexual exploitation:** Children in exploitative situations and relationships receive something such as gifts, money, or affection as a result of performing sexual activities, or others performing sexual activities on them.<sup>1</sup>

The UN Convention on the Rights of the Child (1989) requires states to protect children from abuse.

**Child protection and safeguarding** Child protection is an element of Safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering or likely to suffer significant harm.<sup>2</sup>

<sup>1</sup> Oxfam Child Safeguarding Policy 2018

<sup>2</sup> <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>



## **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.

### **At-risk Adult Safeguarding**

#### **At-risk adult**

A person who is or may need 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.

#### **At-risk Adult Abuse<sup>3</sup>**

At-risk adult abuse can take many forms including physical, sexual, psychological, financial/material, discriminatory, domestic abuse and self-neglect.<sup>4</sup>

**Physical** – Physical abuse occurs when a person purposefully injures or threatens to injure an at-risk adult. It includes, but is not limited to, hitting, slapping, pushing, kicking, misuse of medication, unlawful or inappropriate restraint and inappropriate physical sanctions.

**Sexual** – is unwanted sexual activity or behaviour that happens without consent or understanding.

**Psychological** – is emotional abuse which causes distress and can be verbal and non-verbal.

**Financial and material** – includes theft, fraud, exploitation and pressure in connection to wills, property, inheritance and financial transactions, or inciting an adult at risk to do any of these things on another individual's behalf; it may also involve the misuse or misappropriation of property, possessions and benefits of an adult at risk.

**Discriminatory**- includes abuse based on an individual's race, gender, disability, faith, sexual orientation, or age; and other forms of harassment, slurs or similar treatment or hate crime/incident.

**Neglect or self-neglect** - includes a wide range of behaviours such as neglecting to care for one's own personal hygiene or health. Neglect also includes the failure to provide an at-risk adult with the conditions that are culturally accepted as being essential for their physical and emotional development and well-being.

**Domestic Abuse** – is “any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality”<sup>5</sup>.

## **Coercion**

<sup>3</sup> Indirect Government Services Recognising Adult Abuse, Exploitation and Neglect

<sup>4</sup> Department of Health and Social Care No Secrets: guidance on protecting vulnerable adults in care

<sup>5</sup> Home Office Guidance: Domestic Violence and Abuse



Coercion covers a whole spectrum of degrees of force. Apart from physical force, it may involve psychological intimidation, blackmail or other threats. For instance, threats of being dismissed from a job or of not obtaining a job that is sought. It may also occur when a person is unable to give consent. For example, while drunk, drugged, asleep or mentally incapable of understanding the situation.<sup>6</sup>

## **PSEA**

### **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).

### **Sexual abuse**

The term 'sexual abuse' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

### **Sexual exploitation**

The term 'sexual exploitation' means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. This definition includes human trafficking and modern slavery.

### **Grooming**

Grooming is behaviour that an offender uses to procure sexual activity from a child. It can include building trust with children and/or their carers to gain access to children to sexually abuse them.

### **Online Grooming**

Grooming may be in person as above, or online where the groomer sends electronic messages with the goal of engaging the child in sexual activity.

### **Coercion**

Coercion covers a whole spectrum of degrees of force. Apart from physical force, it may involve psychological intimidation, blackmail or other threats. For instance, threats of being dismissed from a job or of not obtaining a job that is sought. It may also occur when a person is unable to give consent. For example, while drunk, drugged, asleep or mentally incapable of understanding the situation.<sup>7</sup>

### **Modern Slavery**

Slavery is a situation where a person exercises (perceived) power of ownership over another person. Related terms include forced labour, which covers work or services that people are not doing voluntarily but under threat of punishment; human trafficking, which involves deceptive recruitment and coercion; and bonded labour, which is demanded in repayment of a debt or loan.

<sup>6</sup> World Health Organization World Report on Violence and Health (2002)

<sup>7</sup> World Health Organization World Report on Violence and Health (2002)



Modern slavery encompasses a spectrum of labour exploitation, ranging from the mistreatment of vulnerable workers to human trafficking to child labour and forced sexual exploitation.<sup>8</sup>

### **Sexual Violence**

Sexual violence is<sup>9</sup>:

- Any sexual act or attempt to obtain a sexual act
- Unwanted sexual comments or advances or acts to traffic that are directed against a person's sexuality using coercion by anyone, regardless of their relationship to the victim, in any setting, including at home and at work.

Three types of sexual violence are commonly distinguished: sexual violence involving intercourse (i.e. rape), contact sexual violence (i.e. unwanted touching, but excluding intercourse) and noncontact sexual violence (i.e. threatened sexual violence, exhibitionism and verbal sexual harassment). While coerced sex may result in sexual gratification for the perpetrator, its underlying purpose is to express power and dominance over the other person.<sup>10</sup>

### **Child Marriage**

The custom of marrying young children, particularly girls, is a form of sexual violence as children are unable to give or withhold consent.

### **Survivor**

The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive, however it is the individual's choice how they wish to identify themselves.

### **Bullying, Harassment & Discrimination**

#### **Harassment**

Harassment is generally described as "unwanted conduct which affects the dignity of women or men at work that takes place both within the office and off-site at places such as clinics, conferences, and meetings; it encompasses unwelcome physical, verbal or non-verbal behaviour which denigrates or ridicules or is intimidatory". The essential characteristic of harassment is that the action(s) is unwanted by the recipient.<sup>11</sup>

#### **General Harassment**

Harassment can take many forms and may be directed in particular against women and ethnic minorities or towards people because of their age, disability, gender/ gender reassignment, marriage/civil partnership, pregnancy/maternity, race, religion or belief, sex, or sexual orientation, or any other protected class. It may involve action, behaviour, comment or physical contact which

<sup>8</sup> Oxfam PSEA Policy 2018

<sup>9</sup> World Health Organization definition 2012

<sup>10</sup> World Health Organization Global Status Report on Violence Prevention (2014)

<sup>11</sup> Human Resources Solutions. [www.human-resource-solutions.co.uk](http://www.human-resource-solutions.co.uk)





is found objectionable or which causes offence; it can result in the recipient feeling threatened, humiliated or patronised and it can create an intimidating work environment.<sup>12</sup>

Examples of prohibited harassment can include but are not limited to the following:

- Cartoons or other visual displays of objects, pictures, or posters that depict protected groups in a derogatory way.
- Verbal conduct, including making or using derogatory comments, epithets, slurs, or jokes towards such groups.

### Sexual Harassment

The definition of sexual harassment includes 'unwelcome sexual advances, requests for sexual favours, and other conduct that creates a coercive, hostile, intimidating, or offensive work environment'.<sup>13</sup> The harassment of a sexual nature may be directed to a person of the same or opposite sex.

The key elements are that the behaviour is **uninvited**, **unreciprocated** and **unwelcome** and causes the person involved to feel threatened, humiliated or embarrassed. The behaviour may also be determined to be sexual violence and harassment if:

- Submission to such conduct is explicitly or implicitly made a term or condition of employment.
- Submission to or rejection of this conduct is used as a basis for an employment decision affecting the staff member or associate.

Such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

Some examples of sexual harassment can include, but are not limited to:

- Excessive, one-sided, romantic attention in the form of requests for dates, love letters, telephone calls, emails, or gifts.
- Unwelcome sexual advances, such as requests for dates or propositions for sexual favours, whether or not they involve physical touching. This may include an expression of sexual interest after being informed that the interest is unwelcome or a situation, which began as reciprocal attractions, but later ceased to be reciprocal.
- Offering employment benefits in exchange for sexual favours.
- Unwelcome leering, whistling, brushing against the body, sexual gestures, suggestive comments, staring, sexual flirtation, or proposition.
- Displaying a sexually suggestive object in the workplace or telling or showing sexual jokes, stories, drawings, pictures, or gestures.
- Making or repeating a sexually related rumour about another staff member.
- Making an inquiry into a staff or associate's sexual experiences.
- Reprisal or making a threat after a negative response is made to a sexual advance.
- Unwelcome physical contact, including pats, hugs, brushes, touches, shoulder rubs, assaults, or impeding or blocking movements.
- Physical assault, such as rape, sexual battery, an attempt to commit an assault, or intentional physical conduct, such as:

<sup>12</sup> Human Resources Solutions. [www.human-resource-solutions.co.uk](http://www.human-resource-solutions.co.uk)

<sup>13</sup> SEXUAL HARASSMENT IN THE HUMANITARIAN CONTEXT Dr. Linda Wagener, Senior Consulting Psychologist, Headington Institute April 25, 2012



- Impeding or blocking movement.
- Touching or brushing against another staff or associate's body.
- Making a derogatory comment or joke regarding an individual's sexual orientation or perceived sexual orientation.
- Making sexual comments about someone's looks or clothes.

### **Discrimination**

Any unfair treatment or arbitrary distinction based on a person's race, sex, religion, nationality, ethnic origin, sexual orientation, disability, age, language, pregnancy status, fertility status, social origin, or any other protected class. Discrimination may be an isolated event affecting one person or a group of persons similarly situated or may manifest itself through harassment or abuse of authority.<sup>14</sup>

### **Racial or Sectarian Harassment**

"In the workplace, racial or sectarian harassment may take the form of actual or threatened physical abuse or it may involve offensive jokes, verbal abuse, language, graffiti or literature of a racist or sectarian nature or offensive remarks about a person's skin colour, physical characteristics or religion. It may also include repeated exclusion of a person from an ethnic or religious minority from conversations, patronising remarks, unfair allocation of work or pressure about the speed and/or quality of their work in a way which differs from the treatment of other staff or associates."<sup>15</sup>

### **Bullying**

"Bullying is the intimidation or belittling of someone through the misuse of power or position which leaves the recipient feeling hurt, upset, vulnerable or helpless. It is often inextricably linked to the areas of harassment described above. The following are examples of bullying:

- Unjustified criticism of an individual's personal or professional performance, shouting at an individual, criticising an individual in front of others.
- Spreading malicious rumours or making malicious allegations.
- Intimidation or ridicule of individuals with disabilities and /or learning difficulties.



*[Handwritten signature]*

<sup>14</sup> UNHCR Policy on Discrimination, Harassment, Sexual Harassment and Abuse of Authority. 2014.

<sup>15</sup> Human Resources Solutions. [www.human-resource-solutions.co.uk](http://www.human-resource-solutions.co.uk)

*[Handwritten signature]*