

DRC'S SAFEGUARDING POLICY

This policy is in force as of 26-09-2019

Revised in July 2020

I. PURPOSE

The purpose of this policy is to protect people, particularly children, at-risk adults and beneficiaries of assistance, from any harm that may be caused due to their coming into contact with DRC. This includes harm arising from:

- The conduct of staff or associated personnel in DRC's international operations
- The design and implementation of DRC's international programmes and activities.

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

This policy does not cover:

- Sexual harassment in the workplace – this is dealt with under DRC's Code of Conduct
- Safeguarding concerns in the wider community not perpetrated by DRC or associated personnel
- DRC staff and associated personnel in relation to national activities in Denmark, who must comply with *DRC's Code of Behaviour*

II. WHAT IS SAFEGUARDING?

At DRC, safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect. We understand safeguarding to mean protecting people, including children and at-risk adults, from harm that arises from coming into contact with our staff, associated personnel or programmes.

Further definitions relating to safeguarding are provided in the glossary below.

III. SCOPE

- All DRC staff contracted outside of Denmark, and HQ staff on mission to DRC's international operations.
- All associated personnel in relation to DRC's international operations or visits related to DRC, including but not limited to the following: consultants; volunteers; contractors; programme visitors including journalists, celebrities and politicians.

IV. INSTITUTIONAL RESPONSIBILITY

DRC's International Director endorses and gives effect to this safeguarding policy. The process owners for the policy are the Risk and Compliance Secretariat and the Human Resources Department, which will monitor the policy implementation and periodically review and suggest revisions as needed.

V. POLICY STATEMENT

DRC believes that everyone we come into contact with, regardless of age, gender identity, disability, sexual orientation ethnic origin or other attribute(s) has the right to be protected from all forms of harm, abuse, neglect and exploitation. DRC will not tolerate any abuse and exploitation by staff or associated personnel.

This policy will address the following areas of safeguarding: child safeguarding, adult safeguarding, and protection from sexual exploitation and abuse. These key areas of safeguarding may have different policies and procedures associated with them (see *Associated Policies, Procedures and Guidelines* below).

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

A. Prevention

A.1 DRC's responsibilities

DRC will:

- Ensure all staff and associated personnel have access to, are familiar with, and know their responsibilities within this policy;
- Design and undertake all its programmes and activities in a way that protects people from any risk of harm that may arise from their coming into contact with DRC. This includes the way in which information about individuals in our programmes is gathered and communicated;
- Implement stringent safeguarding procedures when recruiting, managing and deploying staff and associated personnel;
- Ensure staff receive training on safeguarding at a level commensurate with their role in the organization; and
- Follow up on reports of safeguarding concerns promptly and according to due process.

A.2 Staff and associated personnel responsibilities

All DRC managers, staff and associated personnel are obliged to contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy. Specific responsibilities include:

Child safeguarding

DRC's *Child Safeguarding Policy* (see Associated Policy VI.2 below) details the organization's full obligations with regard to safeguarding children. In summary, DRC staff and associated personnel must not:

- Engage in sexual activity with anyone under the age of 18
- Sexually abuse or exploit children
- Subject a child to physical, emotional or psychological abuse, or neglect
- Engage in any commercially exploitative activities with children including child labour or trafficking

Adult safeguarding

DRC staff and associated personnel must not:

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

Protection from sexual exploitation and abuse

DRC staff and associated personnel must not:

- Exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance
- Engage in any sexual relationships with beneficiaries of assistance, since they are based on inherently unequal power dynamics

A.3 Managerial responsibility and accountability

DRC Managers who are responsible for hiring, onboarding and managing staff and associated personnel have a particular responsibility to adhere to this safeguarding policy. They are expected to:

- Lead by example and set the tone and clear expectations of behaviour, as explained in DRC's Leadership Concept
- Follow the guidelines outlined in DRC's *Compliance Tool: Safeguarding Through the Employment Cycle* when recruiting, onboarding, managing and off-boarding staff
- Ensure that all associated personnel sign up to DRC's Code of Conduct and abide to the standards of the Code

B. Enabling reports

DRC managers, staff and associated personnel are obliged to report any concerns or suspicions regarding safeguarding violations by DRC staff member or associated personnel.

DRC will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff, associated personnel and the communities we work with.

DRC will ensure that persons reporting (in good faith) safeguarding concerns to DRC are entitled to protection against any retaliatory action taken against them by DRC staff. All allegations of retaliation will be investigated and, if substantiated, shall be considered serious misconduct.

DRC will also accept complaints from any external source such as members of the public, partners and official bodies.

B.1 How to report a safeguarding concern

Staff members who have a complaint or concern relating to safeguarding should report it immediately to the Code of Conduct Reporting Mechanism (CoCRM) at HQ in Copenhagen *and* their line manager. If the staff member does not feel comfortable reporting to their line manager (for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they should report to a more senior manager who is not implicated.

Complaints and concerns shall be reported to the CoCRM (HQ) using this email: c.o.conduct@drc.ngo.

C. Response

DRC will follow up safeguarding reports and concerns according to policy and procedure, and legal and statutory obligations (see VI. Associated policies, procedures and guidelines).

DRC will ensure that safeguarding concerns related to SEA will only be investigated by certified SEA investigators.

DRC will apply appropriate measures to staff found in breach of policy.

DRC will use its best endeavours to 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). Decisions regarding support will be survivor centred.

C.1 Confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need to know basis only and should be kept secure at all times and in line with data protection law(s).

VI. ASSOCIATED POLICIES, PROCEDURES AND GUIDELINES

1. DRC's Operations Handbook: Code of Conduct Reporting Mechanism <https://insite.drc.dk/en/operations-handbook/code-of-conduct>
2. DRC's Child Safeguarding Policy
3. DRC's Leadership Concept
4. DRC's Background Check Policy
5. DRC's Compliance Tool: Safeguarding Through the Employment Cycle
6. DRC's Code of Behaviour
7. UN Secretary- General's Bulletin ST/SGB/2003/13 of 9 October 2003
8. DRC's Code of Conduct

VII. GLOSSARY OF TERMS

Associated personnel

A person that is engaged with work or visits related to DRC, including but not limited to the following: consultants; volunteers; contractors; programme visitors including journalists, celebrities and politicians

Beneficiary of Assistance

Someone who directly receives goods or services from DRC's programme.

Child

A person below the age of 18

Harm

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

Psychological harm

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

Protection from Sexual Exploitation and Abuse (PSEA)

The term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by staff or associated personnel. The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13)

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.

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.

At-risk adult

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