



## 3ie Safeguarding Policy

### 1. Introduction

The purpose of this policy is to protect people, particularly children, at-risk adults and other beneficiaries of assistance, from any harm that may be caused due to their coming into contact with 3ie directly or indirectly through suppliers or other subcontractors. This protection includes harm arising from

- the conduct of staff or personnel associated with 3ie; and
- the design and implementation of 3ie's programmes and activities.

This policy informs staff and associated personnel<sup>1</sup> of their responsibilities in relation to safeguarding and complements these other 3ie policies:

- Bullying and harassment, for which 3ie has a specific Respect at Work Policy for these harms;
- Sexual harassment, for which 3ie has a specific Prevention of Sexual Harassment Policy; and

It reflects safeguarding concerns in the wider development community not perpetrated by 3ie or associated personnel

### 2. Definition of safeguarding

In 3ie, safeguarding means protecting peoples' health, well-being and human rights and enabling them to live free from harm, abuse and neglect. It means protecting people, including children and vulnerable adults, from harm that may arise from coming into contact with our staff, associated personnel or programmes. Safeguarding puts beneficiaries and affected persons at the centre of all 3ie does.

We explicitly use a gender lens when identifying and protecting people from harm. Due to the effects of gendered inequality on women and girls, the harms to women and girls may be different from and compared to how harm impacts men and boys. We explicitly use a diversity lens to ensure that our identification and protection uses an equality lens. With this lens, we identify and offer protection from harm based on sexuality, sexual orientation, ethnicity, caste, age, disability or other social or structural determinant of exclusion or marginalisation that increases risks of harm.

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<sup>1</sup> See Section 3 for definition of associated personnel

This definition draws from our values and principles and shapes our institutional culture. It pays specific attention to preventing and responding to harm from any potential, actual or attempted abuse of power, trust, or vulnerability, especially protection from exploitation or abuse for sexual purposes. See also our Prevention of Exploitation and Sexual Abuse Policy.

Further definitions relating to safeguarding are in the glossary in Appendix A.

### **3. Scope of this policy**

This policy applies to all persons affiliated with 3ie, including full- or part-time employees, consultants, commissioners, members, agency workers, seconded workers, agents, contractors, suppliers or downstream partners.

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

### **4. Policy statement**

3ie believes that everyone with whom we come into contact, regardless of sex, age, gender identity, disability, sexual orientation, ethnic origin, religion or caste has the right to be protected from all forms of harm, abuse, neglect and exploitation. 3ie is committed to providing a healthy and safe working environment. We have a zero-tolerance policy, and will not tolerate bullying, harassment, sexual or other type of exploitation or abuse in any form by staff or associated personnel (see Section 3 for a list of associated personnel). Our Disciplinary Policy will be applied where any breach of this policy has occurred.

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 other specific 3ie policies and procedures associated with them (see Appendix B: Associated policies).

3ie commits to addressing safeguarding throughout our work through these three integrated pillars of action: prevention, reporting and response.

### **5. Principles**

3ie bases its safeguarding policy on these principles:

- We will demonstrate accountability to beneficiaries and survivors, including staff and associated personnel, prioritising those who have suffered and survived exploitation, abuse and violence, and design systems of accountability and transparency that have beneficiaries at their centre.

- We will demonstrate a step change in shifting organisational culture to tackle power imbalances and gender inequality; policies alone are not enough to prevent abuse.
- We will ensure that safeguards are integrated throughout the employment cycle so that we ensure strong checks are in place at the start of employment and regular training and performance management—reinforced by strong codes of conduct and standards—throughout a 3ie career.
- We will ensure full accountability through rigorous reporting and complaints mechanisms for any misconduct that occurs under the banner of our organisation, including by associated personnel. We will pursue all reported misconduct to the full extent according to our established organisational procedures for our own staff and refer as required to appropriate statutory regulatory authorities.
- We will ensure that we hear concerns and act on them through our strong whistle-blowing policy and process, which protects anonymity and safety and ensures that ways of reporting are transparently and actively promoted.

## 6. Prevention

### 6.1 3ie responsibilities

3ie, as an institution under the governance of its Board of Commissioners, with day-to-day responsibilities vested in the executive director, will exercise prevention in these ways:

- Ensure all staff have access to, are familiar with, and know their responsibilities within this policy and associated policies (Appendix B);
- Design and undertake all of its programmes and activities in a way that protects people (see Sections 2 and 3 above) from any risk of harm that may arise from their coming into contact with 3ie. This includes the way in which 3ie gathers, stores, communicates or makes public any information about individuals in our programmes (see Appendix B for other policies);
- 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 organisation; and
- Follow up on reports of safeguarding concerns promptly and according to the processes set out in the due processes described in the associated policies in Appendix B.

### 6.2 Staff responsibilities

#### 6.2.1 Child safeguarding

3ie staff and associated personnel must not directly or indirectly engage in any of these actions:

- 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; or
- Undertake any activity with a child, including, but not limited to, conversations, interviews, photos or video, audio taping or requesting any action of them, without

ensuring their safety and well-being during and after the engagement, ensuring ethical photo, videoing or audio taping, and having the express, fully informed, written or taped consent of a parent or adult guardian or caregiver.

### **6.2.2 Adult safeguarding**

3ie staff and associated personnel must not directly or indirectly engage in any of these actions:

- Sexually abuse or exploit at risk adults;
- Subject an at-risk or vulnerable adult to physical, emotional or psychological abuse, or neglect; or
- Undertake any activity with an at-risk or vulnerable adult, including, but not limited to, conversations, interviews, photos or video, audio taping or requesting any action of them without ensuring their safety and well-being during and after the engagement, ensuring ethical photo, videoing or audio taping, and having their express, fully informed, written or taped consent of a parent or adult guardian or caregiver.

### **6.2.3 Protection from sexual exploitation and abuse**

3ie staff and associated personnel must not directly or indirectly engage in any of these actions:

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

Additionally, 3ie staff and associated personnel are obliged to

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of this Safeguarding Policy; and
- Report any concerns or suspicions regarding safeguarding violations by a 3ie staff member or associated personnel to the designated officer of 3ie.

## **7. Enabling reporting**

3ie will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are available to staff and the constituencies with whom we work. Any staff reporting concerns or complaints through formal whistle-blowing channels will be protected by 3ie's Whistle-blowing Policy. 3ie will accept complaints from external sources, such as members of the public, partners and official bodies.

### **7.1 How to report a safeguarding concern**

Staff members and associated personnel who have a complaint or concern relating to safeguarding should report it immediately to 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 that the line manager is also involved in the acts or omissions comprising the complaint) they may report their concern to the Senior Human Resource Manager ([safeguardingconcerns@3ieimpact.org](mailto:safeguardingconcerns@3ieimpact.org)). Associated personnel can also report to the safeguarding officer of 3ie.

If a complaint or concern relates directly to a donor-funded activity or if it could impact the reputation of the donor, the officer will contact the appropriate person or office procedure in the donor agency. For DFID, 3ie will contact the Counter Fraud Section ([reportingconcerns@dfid.gov.uk](mailto:reportingconcerns@dfid.gov.uk); +44 1355 843 747).

## 7.2 Response

3ie will follow up safeguarding reports and concerns according to statutory obligations and the applicable 3ie policies and procedures (see Appendix B). 3ie will initiate appropriate disciplinary measures against staff found in breach of its safeguarding policy and will also cooperate fully with an investigation initiated by a donor and report any criminal concerns to appropriate authorities.

3ie will offer and provide professional support to survivors of harm caused by staff or associated personnel, at the sole discretion of the survivors.

## 7.3 Confidentiality

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

## 8. Governance of safeguarding

The 3ie Board of Commissioners is fully committed to ensuring that safeguarding and its associated policies and processes are central to 3ie's good governance and accountability to the public, our partners and, especially beneficiaries. Safeguarding will be managed and reported to the board through the mechanisms set up to ensure effective management and implementation of all of 3ie's duty of care policies and processes (see Appendix C):

- A designated senior safeguarding officer reports regularly to the senior management and contributes to consolidated duty of care reporting at each meeting of the 3ie Board of Commissioners
- This officer keeps a detailed register of any safeguarding issues raised and actions to resolve them, treating historical allegations separately and differently from any current disclosures.
- As part of the Recruitment Policy, 3ie conducts criminal background checks on candidates for roles involving working with children or vulnerable adults
- As part of our Recruitment Policy, 3ie collects and verifies references from three of the candidate's most recent line managers or other relevant managers as agreed.
- 3ie provides mandatory training on safeguarding to new personnel during induction and at regular times throughout employment. This includes training on prevention, reporting, response and support.

## **9. Safeguarding obligations for 3ie associated personnel or organisations**

3ie will share this safeguarding policy with its partners, members and suppliers and other associated personnel or organisations. They must attest to having their own safeguarding policy and procedures in place in a formal policy and any associated policies to ensure safeguarding issues are escalated to their highest governance body. Any of them who do not have such policies and processes in place, or 3ie deems them to be insufficient may be asked to sign an agreement to abide by our policies or 3ie may choose not to enter into a contractual or other recognisable relationship with them.

## **Appendix A: Glossary**

### **At-risk or vulnerable adult**

An at-risk adult is sometimes also referred to as vulnerable adult. A person who needs or who 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 harm or exploitation.

### **Beneficiary of assistance**

Someone who directly receives goods or services from or who is the subject of an evaluation done by 3ie or 3ie's contractors or suppliers.

### **Child**

A person below the age of 18.

### **Harm**

Psychological, emotional, physical and any other infringement of an individual's human 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**

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

### **Safeguarding**

3ie defines safeguarding to mean protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect. 3ie understands safeguarding to mean protecting people, including children and at-risk adults, from harm that arises from encountering our staff or programmes. Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond robustly, appropriately and in a timely way when harm does occur.

### **Sexual abuse**

Sexual abuse means the actual or threatened physical intrusion of a person(s) on another in sexual nature, whether by force or under unequal or coercive conditions.

### **Sexual exploitation**

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 by a person(s) of another. person 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.



## **Appendix B: Associated policies**

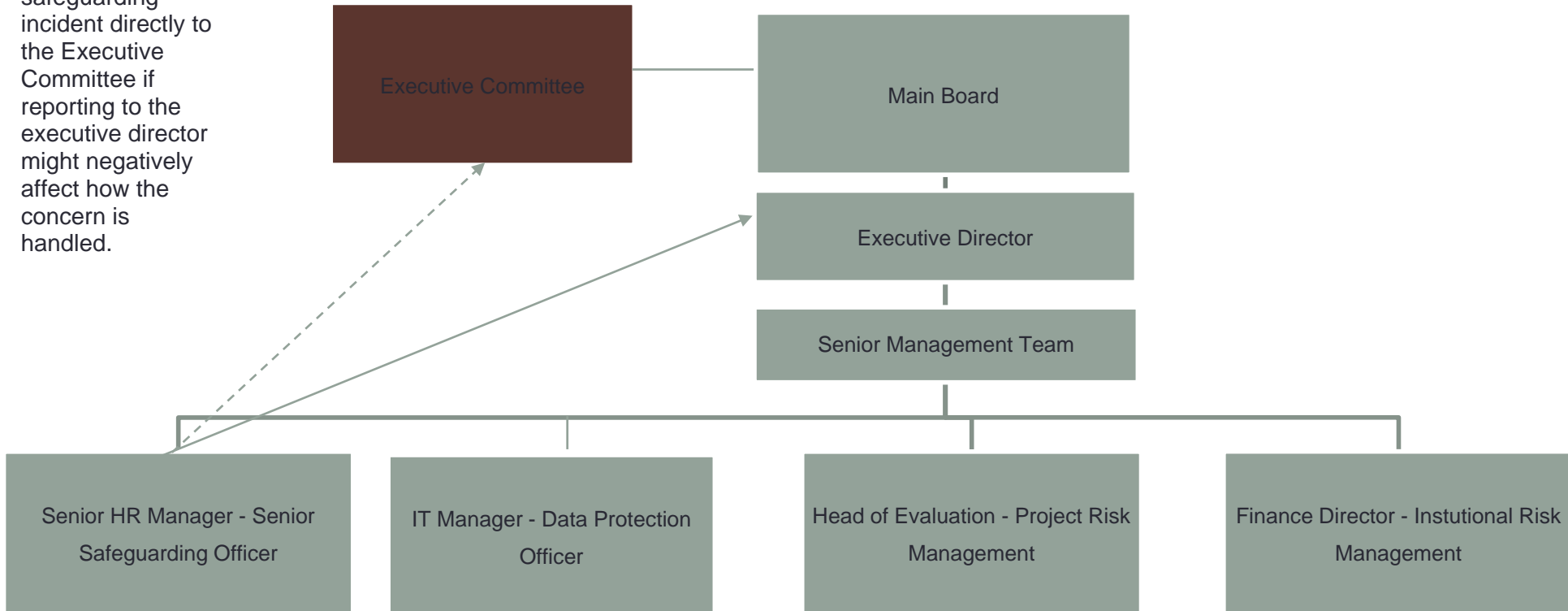
3ie has the following specific policies that are related to and support 3ie's ensuring high standards of safeguarding:

- Anti-Human Trafficking and Anti-Modern Slavery
- Code of Conduct
- Privacy Policy and Terms of Use (electronic)
- Duty of Care
- Prevention of Sexual Harassment
- Prevention of Sexual Exploitation and Abuse
- Respect at Work
- Whistle-blower



### Appendix C: Safeguarding reporting in 3ie

The safeguarding officer may report a safeguarding incident directly to the Executive Committee if reporting to the executive director might negatively affect how the concern is handled.



#### Washington, DC