



Safeguarding Policy

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Contact Details	Anindita Singh, Senior Safeguarding Officer safeguardingconcerns@3ieimpact.org Culture and Ethics committee cec@3ieimpact.org

New Delhi

Unit no. 501A, 5th Floor, Rectangle-1
D-4, Saket District Centre
New Delhi - 110017, India

3ie@3ieimpact.org
Tel: +91 11 4110 2159

London

1 Poultry London
EC2R 8EJ
United Kingdom

3ieuk@3ieimpact.org
Tel: +44 20 3695 7895

Washington, DC

1111 19th Street, NW, Suite 700
Washington, DC 20036
United States of America

3ieus@3ieimpact.org
Tel: +1 202 629 3939

Contents

1. Introduction.....	3
2. Scope of this policy.....	3
3. Definition of safeguarding.....	3
4. Policy statement	4
5. Principles	4
6. Prevention	5
6.1 3ie responsibilities.....	5
6.2 Staff responsibilities	5
6.2.1 Child safeguarding.....	5
6.2.2 Adult safeguarding	5
6.2.3 Protection from sexual exploitation and abuse	6
7. Reporting safeguarding concerns	6
8. Response.....	6
9. Governance of safeguarding	7
10. Safeguarding obligations for 3ie associated individuals or organisations	8
Appendix A: Glossary	9
Appendix B: Associated policies	12

1. Introduction

3ie is committed to safeguarding, ensuring the prevention and reduction of harm to all individuals interacting with 3ie or its work. This includes protecting vulnerable populations, such as children, at-risk adults, and beneficiaries of assistance, who may be engaged through fieldwork, community activities, partnerships, or digital platforms. We actively recognize the need to safeguard against online risks, including data breaches and exploitation. We also prioritize cultural sensitivity, ensuring safeguarding measures respect local norms while upholding universal standards of safety and dignity. This policy aims to prevent harm caused directly by 3ie staff, indirectly through partners, or through program design and implementation, with a focus on prevention, reporting, and survivor-centered responses.

This policy complements these other 3ie policies:

- 3ie Respect at Workplace Policy: for concerns and complaints related to bullying and harassment at the workplace.
- 3ie Prevention of Sexual Harassment Policy: for concerns and complaints related to sexual harassment in the workplace.
- 3ie Prevention of sexual exploitation, abuse and harassment of beneficiaries: for concerns and complaints related to exploitation and abuse of beneficiaries of 3ie's projects.

2. Scope of this policy

This policy applies to all individuals affiliated with 3ie, including full- or part-time staff, consultants, board members, agency workers, seconded workers, agents, contractors, grantees, suppliers or downstream partners, and requires them to act consistently with the requirements for safeguarding.

Safeguarding relates to all 3ie's work, and applies consistently across its programmatic, operational and administrative work – including in the digital environment, and prioritizes the rights, needs and safety of survivors while ensuring due process for those accused until proven guilty.

3. Definition of safeguarding

In 3ie, safeguarding is defined as the actions taken to prevent and respond to harm or abuse caused to any individual as a result of their contact with 3ie or its work. Safeguarding places the rights, dignity and well-being of survivors, beneficiaries and affected persons at the center of all 3ie's work. The policy 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, and protection against harm in the digital environment, including data misuse, online exploitation, and cyberbullying. Additional definitions relating to safeguarding are in the glossary in Annexure A.

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 any form of exploitation or abuse by 3ie staff or associated individuals (see Glossary, Appendix A)

5. Principles

3ie bases its safeguarding policy on these principles:

- The 'do no harm' principle is paramount for safeguarding. 3ie will make every effort to ensure that no one is harmed because of 3ie and its work.
- A survivor-centered approach, confidentiality and the safety, security, privacy and the right of due process of all survivors, complainants or other involved parties are key considerations for safeguarding practice, especially in relation to reporting, investigation and providing assistance to survivors.
- In all our safeguarding actions, the inherent dignity, individual autonomy and rights of those concerned will be respected in line with international laws, with due consideration of children and in general, individual's their right to express their views freely.
- Safeguarding standards will be applied without discrimination based on individual characteristics or personal circumstances. We recognize that some individuals and groups may often be at a higher risk of experiencing safeguarding violations, and therefore such risks should be mitigated accordingly and in partnership with those individuals or groups.
- Safeguards are integrated throughout the employment cycle, by means of a three-step check; OFAC, reference checks and background verification check for all staff at the start of employment, regular training—reinforced by strong codes of conduct and standards of behavior.
- Complete accountability shall be ensured through rigorous reporting and complaints mechanisms for any misconduct that occurs under the banner of 3ie and its work, including by associated individual. 3ie will pursue all reported misconduct to the full extent according to our established organizational procedures for our own staff and refer as required to appropriate statutory regulatory authorities.

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

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 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);
- Ensure secure handling of personal information and provide guidelines for online interactions with vulnerable groups.
- Implement stringent safeguarding procedures when recruiting, managing and deploying staff and associated individuals;
- 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 individuals 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 individuals 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 individuals 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 individuals 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 individuals to the designated officer of 3ie.

7. Reporting safeguarding concerns

Safe, confidential, and survivor-centered reporting mechanisms are available to staff, consultants, beneficiaries, community members and anyone impacted by 3ie's work. Complaints can also be made by external parties, such as members of the public, partners and official bodies.

How to report a safeguarding concern

Staff members and associated individuals who witness or experience safeguarding concerns are encouraged to report it immediately using either of the following:

- Email the concern or complaint to the Senior Safeguarding officer, 3ie (safeguardingconcerns@3ieimpact.org), a position currently being held by the Senior Human Resource Manager.
OR
- Complete and submit the [Safeguarding Reporting Form](#) which allows for anonymous reporting.

If a complaint or concern relates directly to a donor- the senior safeguarding officer will contact the appropriate person in the donor agency. For FCDO, 3ie will contact the Safeguarding Investigation Team (reportingconcerns@fcdo.gov.uk; +44 (0)1355 843747).

8. Response

All safeguarding concerns and incidents must be immediately reported to the Culture and Ethics committee by the Senior Safeguarding Officer or any other individual in 3ie who receives such concern or complaint.

- The members of the committee must acknowledge the complaint within two (2) working days, and will be required to meet within seven (7) working days, to determine the following:

- Whether the concern is internal (i.e. involving a 3ie employee, consultant or associated individual) or external (i.e. involving a member of the community)
- Whether the concern is a violation of 3ie's safeguarding policy and protocols
- Whether the concern is a potential criminal activity

The committee may further seek additional details and/or documentation to decide on the recommended action to be taken which will be as follows:

- Where the concern or complaint is child protection related, provide support to child and family throughout the process.
- Where the concern involves the violation of 3ie's safeguarding policy and protocols, enact appropriate disciplinary procedures in accordance with 3ie's Human Resources policies. This may range from counselling, warning, to dismissal, termination of contract.
- Where the concern involves potential criminal activity, refer to the appropriate law enforcement agency in the jurisdiction. If it is child protection related, refer to the appropriate Child Protection Agency.
- Where the concern is neither a violation of the Safeguarding Policy nor a criminal matter, no further action is to be taken.
- Comply with any investigation initiated by a donor.

The committee will submit a written report to the 3ie Executive Director and the senior management team, who will be responsible for acting upon the recommendations mentioned therein. This is to be completed within a 30 working days timeframe from the receipt of the complaint.

Survivor assistance:

Access to assistance and support, including medical and psychological will be made available to victim/survivors of harm or abusive incidents, including sexual exploitation and abuse, when the victim/survivor is an individual directly participating in 3ie programmes or activities, and in line with relevant international guidelines and good practices.

Confidentiality:

It is essential that confidentiality, respect for the survivor's dignity, and their autonomy are maintained at every stage of addressing 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.

9. Governance of safeguarding

Safeguarding will be managed and reported to the board through the mechanisms set up to ensure effective implementation of the policy (for details see Appendix C):

- The Senior Safeguarding Officer reports on a quarterly basis to the senior management team which in turn contributes to the consolidated safeguarding reporting at each meeting of the 3ie Board.
- This Senior Safeguarding Officer maintains a detailed register of safeguarding issues raised and actions taken.

Training and awareness

- **Induction Training:** All new staff, consultants and associated individuals must complete mandatory safeguarding training as part of their induction.
- **Refresher Training:** Safeguarding training will be conducted annually for all staff to refresh knowledge and update practices.
- **Specialized Training:** Staff in specific roles such as the senior safeguarding officer and members of the Culture and Ethics Committee will receive additional, role-specific training on safeguarding issues.

10. Safeguarding obligations for 3ie associated individuals or organisations

3ie will share its safeguarding and associated policies with its partners, members and suppliers and other associated individuals and/ or organisations. They must attest to having their own safeguarding policies and procedures in place in a formal policy. Any associated individual or organisation that does not have such policies and processes in place, or 3ie deems them to be insufficient or non-compliant, will be asked to sign an agreement to abide by 3ie policies till the time they develop their own or address the inadequacies. Where there is a reasonable belief that the safeguarding risk is high, 3ie may choose not to enter into a contractual or other recognizable relationship.

3ie will establish confidential feedback channels for staff, beneficiaries, and partners to share concerns or suggestions about safeguarding practices. Feedback will be reviewed regularly to strengthen policies, training, and operations.

Policy Review:

This policy will be reviewed every two years, unless required earlier, to ensure its effectiveness and compliance with international safeguarding standards.

Appendix A: Glossary

At-risk or vulnerable adult

An at-risk adult is sometimes also referred to as a 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 under the age of 18.

Code of Conduct

A set of rules outlining the responsibilities, ethical standards, and expected behaviors of individuals associated with an organisation.

Confidentiality

The obligation to protect sensitive information about individuals or incidents, sharing it only on a need-to-know basis to ensure privacy and security.

Cultural Sensitivity

Respecting and understanding diverse cultural norms, practices, and values when implementing safeguarding measures, ensuring actions are appropriate to the local context while upholding universal standards.

Digital Safeguarding

Measures to protect individuals from harm that can occur in digital environments, including online exploitation, data breaches, cyberbullying, or misuse of personal information.

Downstream Partner

Any organisation, group, or individual engaged by a primary partner to assist in implementing programs or activities, who is also subject to safeguarding standards.

Exploitation

The abuse of an individual's vulnerability, power imbalance, or trust for personal or organisational gain, including but not limited to sexual exploitation, forced labor, or other forms of coercion.

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 individuals. 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 means 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 a 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.

Survivor Centric Approach

An approach that prioritizes the rights, needs, and dignity of individuals who have experienced harm or abuse, ensuring their safety, choices, and confidentiality in any response.

Vulnerable Population

Groups of individuals at greater risk of harm or exploitation due to their age, gender, disability, socioeconomic status, or other factors, such as children, at-risk adults, or beneficiaries of programs.

Associated Individuals

All 3ie staff, consultants, interns, board members, as well as those involved in 3ie projects and/ or 3ie-funded research activities, for example downstream partners, contracting organisations, their staff members, collaborating partners including their staff members, community participants and other stakeholders.

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.

