



Sustainable Energy for All

Safeguarding Policy



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1. Introduction

Safeguarding is the responsibility of Sustainable Energy for ALL (referred to as SEforALL) to ensure that the organisation's staff, consultants, interns, secondees, volunteers, vendors, partner organisations, and its operations and programmes do no harm to children, young people or vulnerable adults. There has been a significant increase in the efforts made by development organisations to ensure that no harm results from the contact their employees, volunteers and other representatives have with their target populations or communities. It is also the responsibility of SEforALL to protect its staff and volunteers when they are vulnerable, for example, when ill or at risk of harm or abuse.

Children, young people or vulnerable adults should not be exposed to the risk of discrimination, neglect, harm and abuse. Through its work, SEforALL staff, consultants, interns, secondees, volunteers, vendors and partner organisations may engage with young people and vulnerable adults either directly or indirectly. SEforALL recognises that it has an obligation to put in place all reasonable safeguarding measures to ensure, as far as possible, the safety and protection of these groups of people.

Child protection is a central part of but not separate to safeguarding. It is the process of protecting individual children identified as either suffering or at risk of significant harm as a result of abuse or programme of work. It also includes measures and structures designed to prevent and respond to abuse.

The Administrative Board has oversight of the effective implementation of this policy and associated procedures and ensuring that everyone linked with SEforALL is equipped and supported to meet their responsibilities.

2. Scope

This policy is mandatory for anyone who works for or on behalf of SEforALL, either in a paid or unpaid capacity and this includes all directly employed staff, consultants, interns, secondees, junior professional officers (JPOs), and volunteers (referred to as "staff"), as well as SEforALL Ambassadors, and Administrative Board members. This policy also applies to partners that SEforALL funds should they not have their own Safeguarding Policy.

3. Purpose

The SEforALL Safeguarding Policy is to protect people, particularly children, young people and at risk adults, from any harm that may be caused due to their coming into contact with SEforALL. This includes harm arising from:

- the conduct of staff or SEforALL representatives, and
- the design and implementation of SEforALL's programmes, partners and activities.

The policy lays out the commitments made by SEforALL, and informs all stakeholders of their responsibilities in relation to safeguarding.

Any breach of this policy will be treated as a disciplinary matter, which may result in immediate termination of employment or contract, withdrawal of volunteer status, and reporting to the police, relevant regulatory authority or other body.

4. What is safeguarding?

Safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live in safety, free from harm, abuse and neglect. In line with Article 19 of the United Nations Convention on the Rights of the Child (UNCRC), SEforALL's Safeguarding Policy acknowledges that all children have a right to protection, from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s), or any other person who has the care of the child. Furthermore, this right is extended to all vulnerable adults who may come into contact with our staff or programmes.

5. Policy Statement

SEforALL recognises that **safeguarding is everyone's responsibility** and that it has an obligation to put in place reasonable measures to ensure, as far as possible, the safety and wellbeing of vulnerable people with whom it works and those in the communities in which it operates.

SEforALL believes that everyone the organisation comes into contact with, regardless of age, race, sex, sexual orientation, marriage and civil partnership, pregnancy or having a child, gender reassignment, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status has the right to be protected from all forms of harm, abuse, neglect and exploitation.

SEforALL has zero tolerance against abuse and exploitation of vulnerable people by its staff or its representatives. SEforALL believes that:

- the welfare of children, young people and vulnerable adults is paramount.
- our physical and virtual spaces should be safe and secure and promote enjoyable and positive experiences.
- all suspicions and allegations of harm should be taken seriously and responded to speedily and appropriately.
- all staff should be aware of their responsibility to ensure the safeguarding of children and vulnerable adults.
- our recruitment processes should ensure that our staff do not pose a risk of harm to children, young people or vulnerable adults.

SEforALL recognises that an element of risk exists, and while the organisation may never be able to totally remove this, there is need to do all that can be done to reduce it or limit its impact.

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

6. Definitions and Core knowledge

In order to safeguard the welfare of children, young people and vulnerable adults all stakeholders impacted by this policy need an understanding of common safeguarding terms.

Definition of a child and a vulnerable adult: The UNCRC Convention (Article 1) defines a 'child' as a person below the age of 18, unless the laws of a particular country set the legal age for adulthood younger. For clarity, the term 'child' and 'young person' is used in this policy to denote anyone under the age of 18.

Where there is a discrepancy in age definitions between the laws of a country and this policy then the upper age limit should prevail in triggering SEforALL's safeguarding procedures, whilst accepting the fact that it may not be possible to take action under the laws of the country involved. Safeguarding incidents should nonetheless be investigated under this policy.

A vulnerable adult is a person aged 18 or over who has the right to be protected from violence, abuse, neglect or exploitation, and to make informed decisions free from duress or influence or impairment. This impairment could relate to the following factors: physical or mental disability; illness; old age; emotional fragility or distress; gender; ethnicity; religious beliefs or otherwise. Vulnerability can be temporary or indefinite and should be seen as a continuum which reflects the shifting nature of vulnerability in the context of our work.

What constitutes harm: Living a life that is free from harm and abuse is a fundamental human right for every person. Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect by inflicting harm, or by failing to prevent harm. Someone may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults or by a child or children. SEforALL knows that the children and vulnerable adults in the communities it works with can be particularly at risk. Different types of harm can include the following:

- Financial harm (for example an individual is unclear or confused about where their money has gone);
- Physical harm (for example an individual has bruises or marks that they cannot properly explain);
- Psychological harm (for example an individual is being verbally bullied by others);
- Sexual harm (for example an individual is being sexually harassed or intimidated);
- Neglect (for example an individual is not washing or eating properly);
- Abuse of authority or power (for example a person is frightened to disagree or contradict someone who is pushing them for an answer);

The examples given above are not exhaustive, and there are many types of actions and behaviours that could be considered harmful to others. Deciding if something is abuse is complex and staff should be encouraged to report any concerns they have, however minor, rather than waiting until things reach the level of abuse. Harm is not always easy to spot but the above give examples of situations to be aware of. Above all, trust your instincts –if something feels wrong, say something.

7. Prevention

7.1. SEforALL responsibilities

SEforALL will:

- ensure all staff have access to, are familiar with, and know their responsibilities within this policy.
- Ensure that during recruitment, vetting processes to support recruitment of the right people is carried out.
- ensure that staff are inducted in our Safeguarding Policy as a key part of the recruitment and on boarding process.
- ensure that all partners are informed and in compliance with our Safeguarding Policy.
- ensure that partners' safeguarding procedures are consistent and in line with the principles and approaches set out in 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 SEforALL. 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.
- ensure staff receive training on safeguarding at a level commensurate with their role in the organization.
- ensure the best interests of the vulnerable person are paramount and shall be the primary consideration in our decision making.
- follow up on reports of safeguarding concerns promptly and take action where SEforALL believes that a child, young person or vulnerable adult is at risk or is actually harmed.
- always seek to work in ways which are culturally sensitive and that respect the diverse nature of the people SEforALL works with. Culture must not be used as an excuse to abuse children, young people or vulnerable adults.

7.2. Responsibilities

All staff and people representing SEforALL will:

- read, understand and adhere to the SEforALL Safeguarding Policy
- strive to promote a zero-tolerance approach to discrimination, sexual harassment and abuse in all working environments.
- place the safety and welfare of children and vulnerable people above all other considerations.
- strive to develop relationships with all stakeholders which are based on equality, trust, respect and honesty.

Safeguarding Children, Young People and Vulnerable Adults and protection from sexual exploitation and abuse

Staff and people representing SEforALL must not:

- behave or communicate with children, young people or vulnerable adults in ways which seek to build inappropriate relationships in order to abuse them or put them at risk.
- engage in sexual activity with children, young people and vulnerable adults including beneficiaries of assistance, since such relationships are based on inherently unequal power dynamics.
- sexually abuse or exploit children, young people and vulnerable adults
- give special rewards or privileges in an attempt to build inappropriate relationships with children, young people and vulnerable adults
- subject a children, young people and vulnerable adults to physical, emotional or psychological abuse, or neglect.
- engage in any commercially exploitative activities with children including child labour or trafficking.
- use their position to intimidate, bully, threaten, discriminate against, coerce or undermine children, young people and vulnerable adults.
- exchange money, employment, goods, or services for sexual activity with children, young people and vulnerable adults.
- carry out humiliating, degrading or exploitative forms of behaviour over children, young people and vulnerable adults.

- contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy.
- report any concerns they may have regarding safeguarding violations by a SEforALL staff members and representatives.

7.3. Duty of care

Individuals should ensure that they are never alone with a child or vulnerable adult. There should be two adults with any group of children and/or vulnerable adults at all times, and the SEforALL staff / representatives should stay within sight of one another. SEforALL staff/ representatives will not always know the full background of the second adult, but the 'Two adults principle' offers a higher level of protection than where an adult works alone with a child or vulnerable adult. They must stay vigilant in supervising individuals who are given access to children and vulnerable adults.

7.4. Working with partner organisations

SEforALL delivers its programmes and activities in partnership, and in some instances may fund partners. If the funded partner organisation does not have an appropriate similar policy in place, then SEforALL's Safeguarding Policy takes the precedent.

Funded partners commit to ensuring that all cases of suspected and/or alleged safeguarding incidents which relate to SEforALL are reported at the earliest opportunity to the leadership team member they are working with, or the Compliance Officer. Partners will provide SEforALL with all relevant or requested information to enable an appropriate investigative response.

7.5. SEforALL Leadership Team responsibilities

The SEforALL Leadership team is responsible for ensuring that funded partner organisations, staff, and others representing SEforALL are aware of the policy and are supported to implement and work in accordance with it, as well as creating a leadership culture that pays attention to safeguarding. They must ensure that they are responsive, acting immediately if they become aware of any safeguarding concerns, and supportive towards those who complain about breaches in this policy.

Human Resources is responsible for:

- ensuring the policy is implemented throughout the organisation and that safeguarding training is provided.
- monitoring and recording safeguarding concerns.
- ensuring referrals to the relevant authorities happen without delay.
- updating safeguarding training for all staff.
- ensuring this policy is reviewed every three years or earlier if necessary.

7.6. Use of images and information and visits

Photographs, films and websites must show respect for children, young people and vulnerable adults, and be in their best interest. SEforALL pays particular attention to pictures, images, videos or other likenesses of children, young people and vulnerable adults and/or information related to children, young people and vulnerable adults that could compromise their care and protection. These will not be made available

through any form of communication media or funding application or report without proper protection, full voluntary informed consent and understanding of their use. Images with corresponding text which may identify a child, young person or vulnerable adult should be removed and any identifying images or data will be stored securely. SEforALL will also change names as appropriate.

Any media or donor representatives will be chaperoned and will be obliged to adhere to these safeguarding protocols, including signing up to this policy.

8. Enabling reports

SEforALL will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available.

Any staff, or other individuals, who report concerns or complaints through formal whistle-blowing channels will be protected by SEforALL's Whistleblowing Policy.

9. Procedure for raising a concern

Any person who is aware of safeguarding suspicions, allegations or actual wrongdoing by a person representing SEforALL in any of the countries where SEforALL operates, has an obligation to notify the SEforALL **Compliance Officer**, who is also the Lead Human Resources. Where possible, please use the Safeguarding Incident Recording Template attached as Appendix 1.

The Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct or safeguarding issues or others are investigated and resolved. All concerns should be presented in writing, and give as much information as possible – including any relevant names, dates, places, etc. The earlier a concern is raised, the easier it is to take effective action.

The Compliance Officer can be contacted directly via email at compliance@seforall.org or by writing to: Compliance Officer, Sustainable Energy for All, Andromeda Tower 15th Floor. Donau-City-Strasse 6. 1220, Vienna. Austria. Write 'Compliance Officer - Private and Confidential' on the envelope.

If a concern involves the Compliance Officer, or where the whistleblowing individual believes that the Compliance Officer may be biased, the matter should be referred directly to the Chief of Staff, providing justification for why the individual believes this is the case. If a concern involves the Chief of Staff, or where the whistleblowing individual believes that the Chief of Staff may be biased, the matter should be referred directly to the Chief Executive Officer, providing justification for why the individual believes this is the case. External individuals raising concerns must do so through the Compliance Officer using the details above.

If a concern involves the Chief Executive Officer, or if it is that the reporting individual would like to refer the issue to a non-SEforALL staff member, the matter can be referred to a member of the Administrative Board, providing justification for why the individual believes the Chief Executive Officer or any other SEforALL staff member may be biased. The Administrative Board representative can be contacted directly via email at adminboard@seforall.org The representative can also be contacted by writing to: Administrative Board Representative, Sustainable Energy for All, Andromeda Tower 15th Floor. Donau-City-Strasse 6. 1220, Vienna. Austria. Write 'Administrative Board Representative - Private and Confidential' on the envelope, which will be provided for the attention only of the Administrative Board representative.

9.1. Contacting SEforALL anonymously/hotline

SEforALL has a specific email address that an individual can use to contact us confidentially (and anonymously should they wish) about any unethical / illegal conduct / safeguarding / whistleblowing issues: hotline@seforall.org Only the Compliance Officer access to this email.

10. SEforALL's Response

If any safeguarding case should arise, then as a responsible organisation, SEforALL will ensure that it is investigated and followed up on appropriately, with recourse and referral to relevant authorities as needed. Investigation may involve external parties to ensure neutrality. Allegations made in the country offices will additionally be considered in line with the national legislation.

SEforALL's Compliance Officer will notify the person who submitted a complaint and acknowledge receipt of the reported safeguarding issue. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by an investigation.

The Compliance Officer will first make enquiries to decide whether an investigation should be carried out, and if so, how this should be done. The decision may be to hold an informal review, an internal inquiry or a more formal investigation. The concern may be investigated by the appropriate SEforALL staff and dealt with, or may be referred to the following:

- the police or other statutory authority
- an independent investigator

In deciding the most appropriate course of action, consideration should be taken of possible secondary harm to the victim through reporting in some contexts. Where there are concerns this should be discussed, and a decision taken on the balance of risk. The principle of do no harm should prevail when reporting to authorities. The decision should be documented, and a record kept as to the course of action decided upon.

If SEforALL needs to take urgent action, this will be done before carrying out any investigation.

The Compliance Officer keeps a confidential record of all concerns raised and the outcomes of processes followed to resolve. The Compliance Officer will advise the Chief of Staff and the Chief Executive Officer of all complaints received and the actions taken to address them. The Chief Executive Officer will keep the Administrative Board fully informed of all concerns and cases, providing a quarterly summary of all cases raised, without revealing any specific details – except where allegations are found to be substantiated.

SEforALL will offer support to survivors of harm caused by staff, regardless of whether a formal internal response is carried out, such as an internal investigation.

Upon the conclusion of the investigation, the reporting individual may be asked for their opinion on how well they feel their concern was handled.

Where allegations are made about, SEforALL will take careful consideration about the appropriateness of the person continuing to work with or for SEforALL.

SEforALL will apply appropriate disciplinary measures to staff in breach of policy.

SEforALL commits to disclose to its funding partners any Safeguarding allegations, whether proven or not.

11. Reprisal

SEforALL will not tolerate any form of harassment, bullying, victimisation, coercion, intimidation, reprisal or retaliation or prejudice against anyone who whistleblows, or provides any information or other assistance in a raised concern or an investigation. Any such behaviour may be treated as a disciplinary offence.

12. Malicious Allegations

If an individual makes an allegation that they believe is true, but it is not confirmed by our investigation, SEforALL will not take any action against the individual. However, if the individual makes a malicious allegation that they know is untrue, SEforALL will take appropriate disciplinary or legal action against them.

13. Data Protection and Confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. All sensitive and personal data must be kept confidential (including the names of anyone who makes a report of abuse), and be shared on a strictly 'need to know basis', that is, access must be necessary for the conduct of one's official duties.

It is unacceptable and potentially defamatory for concerns of abuse (and abusers) to be spread throughout the organisation rather than being directed through a formal complaints process. All participants must understand the importance of following the set reporting lines when concerns arise. Protection of the child, young person or vulnerable adult who has been subject to harm must be the primary consideration. Breaches of confidentiality may be treated as a disciplinary offence.

14. Monitoring of this Policy

SEforALL commits to monitoring the implementation of the Safeguarding Policy to ensure its effective application. The SEforALL annual audit process will be used as a tool to identify any compliance and reporting issues in all offices. Human Resources will keep the Chief of Staff and the Chief Executive Officer fully informed of all concerns and cases relating to safeguarding, as well as the effectiveness of procedures. This policy will be reviewed every three years and earlier if necessary, especially after any safeguarding incident. The Board will maintain oversight of the policy.

15. Resources

Please

- 1) watch the 24-min video titled 'To Serve with Pride' developed by the UN Task Force on Sexual Exploitation and Abuse (some viewers may find this distressing):
<https://youtu.be/NfMKMCYFgPo>
- 2) Read the DFID Enhanced Due Diligence: Safeguarding for external partners document adopted by most of the SEforALL donor countries and institutions:
<https://www.gov.uk/government/publications/dfid-enhanced-due-diligence-safeguarding-for-external-partners/enhanced-due-diligence-safeguarding-for-external-partners>

16. Appendix 1: Safeguarding Incident Recording Template

Safeguarding Incident Recording Template	
Your Details:	
1. Name	
2. Job Role	
3. Date	
4. Contact Details (Phone and e-mail)	
5. Your relationship with SEforALL	
Details of Incident / disclosure	
6. Date of initial raising of concern / incident	
7. Who raised the concern? <ul style="list-style-type: none"> <input type="radio"/> Name <input type="radio"/> Contact details 	
8. Who is the vulnerable person / child? <ul style="list-style-type: none"> <input type="radio"/> Name <input type="radio"/> Age (if applicable in the case of Under 18) <input type="radio"/> Contact details <input type="radio"/> Parents contact details 	
9. Where did the incident occur?	
10. When did the incident occur? <ul style="list-style-type: none"> <input type="radio"/> Date and time 	

11. What happened?	
12. Were there witnesses? <ul style="list-style-type: none"><input type="radio"/> Name<input type="radio"/> Age (if applicable in the case of Under 18s)<input type="radio"/> Contact details	
After the incident/ disclosure	
13. Were there any witnesses to the referral? <ul style="list-style-type: none"><input type="radio"/> Name<input type="radio"/> Contact details	
14. Who have you discussed this incident with? <ul style="list-style-type: none"><input type="radio"/> Name<input type="radio"/> Contact details	
Please save this report securely and send it to Compliance Officer: compliance@seforall.org	