Safeguarding Policy

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FIND	SAFEGUARDING POLICY		
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1. Policy Statement

FIND is committed to promoting a culture of dignity, respect and safety in its global workplaces and across all its programmatic activities. The organisation will ensure that integrity, accountability and respect are central to the way FIND operates, with integrity understood as honest conduct, good faith and fair dealing.

Safeguarding is an integral part of FIND's core values and is embedded within its governance, operations, activities, programmes and organizational culture.

FIND adheres to applicable law and recognized international principles on the protection of the child, safeguarding and ethical research, including the Helsinki Declaration: *Ethical Principles for Medical Research Involving Human Participants* and the CIOMS/WHO: *International Ethical Guidelines for Health-Related Research Involving Humans*.

Given FIND's global health activities and its work with research participants, children and adults who may be at risk of harm, FIND is committed to preventing and responding to harm, abuse, exploitation and neglect arising from contact with FIND personnel, partners and/or from FIND activities.

FIND recognizes that unequal power dynamics may arise within the organization and in interactions with local communities and persons affected by FIND activities. Such imbalances may increase the risk of exploitation, abuse, coercion, retaliation and barriers to reporting, particularly where FIND personnel or partners control access to employment, services, research participation, funding or other resources. FIND actively seeks to address these imbalances, prevent misuse of power and challenges these power dynamics through the implementation of appropriate safeguarding measures and accountability mechanisms.

In support of these commitments, the Whistleblowing Policy outlines the FIND Whistleblowing Management Mechanism (WMM), provides the framework for reporting, assessing and investigating safeguarding concerns, that these will be heard, acted upon and addressed through appropriate processes. Confirmed safeguarding concerns will result in appropriate actions. Internal safeguarding concerns are also addressed through various channels of reporting and investigation through its grievance procedure.

2. Purpose

The purpose of this Policy is to set out FIND's commitment to prevent, identify, report and respond to safeguarding concerns and ensure that all individuals affected by FIND's activities, are treated with dignity, respect and protected from harm. This Policy establishes safeguarding standards that apply across FIND's operations, programmatic activities (including research) and relevant partnerships.

This Policy shall be implemented in accordance with applicable laws, recognized international standards, research ethics principles and guidelines, and Good Clinical Practice, where applicable.

FIND applies the principle of "*do no harm*" and will take reasonable and proportionate measures to prevent foreseeable safeguarding harm, reduce safeguarding risks and respond appropriately when concerns arise.

Safeguarding includes prevention, risk management, safe and accessible reporting, timely response, appropriate support, accountability and measures to reduce recurrence.

Given FIND's global operations, particularly in LMICs, this Policy:

- reinforces a culture of dignity, respect and safety across FIND's activities;
- establishes a clear framework for safeguarding prevention, risk identification, reporting, and response;
- sets minimum conduct standards;
- required for appropriate safeguarding measures for work with children, vulnerable adults, research participants and communities;
- sets expectations for partners through proportionate due diligence and contractual requirements, as appropriate;
- requires that responses to be non-discriminatory, child-, person- and survivor-centered, prioritizing safety, dignity, informed choice with the aim to avoid further harm.

3. Scope and relationship with other FIND Policies

This Policy forms part of FIND's core governance framework and applies to all

- FIND personnel - members of governance bodies, its officers, employees, interns, FTECs, including FIND Country Offices ('FIND Personnel');
- Partners - third parties whom FIND work with or who work on its behalf, i.e., consultants, agents, volunteers, representatives, service providers, collaborating partners, and independent contractors, other stakeholders and other entities or individuals acting officially on behalf of FIND, across all country offices, projects and sites worldwide('Partners').

FIND will incorporate appropriate safeguarding requirements into relevant employment, consultancy, partnership, grant and other contractual arrangements, taking into account the nature and associated safeguarding risk of the relationship.

FIND Personnel must comply with this Policy and and promptly report safeguarding concerns. Partners must comply with the safeguarding and reporting obligations applicable under their agreement with FIND.

Safeguarding concerns may be raised through the established reporting channels described in the Whistleblowing Policy, the Grievance and Complaints Policy, . Safeguarding issues relating to the C-Suite and Board can be reported directly to the Board Safeguarding Representative, a designated Board member responsible for oversight of safeguarding and child protection matters.

Safeguarding is a shared responsibility at FIND, with each individual accountable for upholding this Policy. While this Policy recognizes the importance of local context, culture and values in its implementation, local practices or customs cannot justify conduct that is prohibited under this Policy.

Safeguarding principles shall be embedded in FIND's activities and operations. This includes fostering an environment where individuals (employees, partners, research participants) can raise concerns without fear of retribution and promoting continuous learning by sharing lessons learned and best practices to strengthen safeguarding.

This Policy also applies where the conduct creates a safeguarding risk.

The role, responsibilities and reporting arrangements of the Board Safeguarding Representative are set out in the Board Safeguarding Representative Terms of Reference.

4. Definitions

Vulnerable Adult: a person aged 18 or over who, because of circumstances such as disability, illness, age, dependency, displacement, social or economic circumstances, or a particular relationship of power or trust, may be at increased risk of abuse, exploitation or neglect. Being in this category does not imply a lack of decision-making capacity.

Children: refers to a person under the age of 18, regardless of the age of majority or age of consent in the location where an incident may have occurred.

Harm: physical, sexual, emotional, psychological, financial or other injury, abuse, exploitation, neglect or adverse impact, through acts or omissions connected with FIND personnel, partners or activities.

Neglect: the failure to provide adequate care or protection, or support , where that failure exposes a child or an adult at risk to harm.

Reporting Channels: the channels made available by FIND for raising safeguarding concerns as described in the FIND Whistleblowing Policy and in this Policy.

Safeguarding: the actions, systems and measures adopted by FIND to prevent, identify and respond to any form of harm, damage, exploitation, abuse or neglect arising from the conduct of FIND's personnel or partners or from FIND's activities, programmes or operations. Depending on the context, safeguarding concerns may include:

- child protection;
- protection of adults at risk;
- bullying, mobbing, harassment, and direct and indirect discrimination;
- psychological or physical abuse;
- sexual harassment, misconduct, or exploitation;

- peer-on-peer abuse, including harassment or assault;
- online and digital safety in connection with FIND's activities;
- financial exploitation.

Board Safeguarding Representative: a member of the Board responsible for governance-level oversight on safeguarding, receive regular reports and oversee serious, high-risk safeguarding matters in line with this Policy.

Sexual Harassment: any unwelcome, unwanted or inappropriate conduct of a sexual nature that might reasonably be expected or be perceived to cause offence, humiliation or distress, whether verbal, non-verbal, physical or visual.

5. Safeguarding Principles and Conduct Standards

FIND applies the following safeguarding principles:

- do no harm and safeguarding risk prevention;
- child-/person-/survivor-centred approach, as appropriate;
- safety, dignity, non-discrimination and inclusion;
- confidentiality and information sharing only on a need-to-know basis;
- informed choice, participation and consent;
- prohibition of retaliation against any person who raises or participates in the handling of a safeguarding concern in good faith and
- accountability, procedural fairness and due process.

FIND Personnel and Partners acting in connection with FIND activities must:

- take personal responsibility for safeguarding in their interactions and decisions;
- treat colleagues, research or programme participants, community members and other individuals with dignity and respect;
- maintain appropriate professional boundaries;
- use appropriate and inclusive language and avoid any derogatory, discriminatory, humiliating, abusive or offensive conduct
- refrain from all forms of verbal, emotional, or physical, sexual or financial abuse or exploitation;
- avoid jokes, 'banter' (jesting, teasing or mocking remarks) or other conduct that could be perceived as disrespectful, humiliating or aggressive or deemed as culturally inappropriate;
- protect confidential and personal information and use images, recordings and digital communications responsibly;
- never abuse a position of power, trust or vulnerability for sexual purposes or personal or organizational benefit;
- never exchange or offer money or any other benefits for sex, sexual activity or sexual favours in connection with FIND activities;
- never engage in sexual activity with a child or minor; a false belief about a child's age is not a justification;

- never retaliate against a person for raising or participating in the handling of a safeguarding concern; remain alert to safeguarding risks and issues and report any safeguarding concerns through the appropriate reporting channels as soon as possible.

6. Safeguarding in FIND Activities

6.1. Safeguarding Conduct Requirements

To uphold its duty of care and support a culture of safety, dignity, and accountability, FIND will apply safeguarding principles and practices proportionate to the risk and nature of its activities, including:

- maintaining safe and reasonably accessible reporting channels and protecting those who raise concerns, witnesses involved from retaliation or adverse treatment;
- providing policies, guidance and regular safeguarding training, including on practices such as professional boundaries, responsible communications and interactions with children and vulnerable adults;
- taking reasonable measures for a safe working, programme and research environment;
- monitoring implementation of safeguarding requirements through appropriate managerial, programme and compliance oversight;
- sharing safeguarding information on a strictly need-to-know basis, where necessary for prevention, response, support, investigation, decision-making or legal compliance and subject to confidentiality and data-protection obligations;
- integrating safeguarding into project and partnership lifecycle, including project design and planning, risk assessment, partner selection, contracting, budgeting, implementation, monitoring, evaluation and project closure, proportionate to the safeguarding risk.

6.2. Safeguarding Children

FIND is firmly committed to the prevention and reduction of any risk of harm to children. FIND prohibits child exploitation, abuse and neglect.

FIND Personnel and Partners must treat children with dignity, respect and protect their rights at all times without discrimination.

The *"best interests of the child"* will be the primary consideration in all actions or decisions affecting children. Children must also be enabled to express their views freely on matters affecting them, and those views shall be given appropriate weight in accordance with their age and maturity.

Adults working with or supporting children are in positions of trust and authority and must act accordingly.

Where child exploitation, abuse or neglect is suspected, FIND will take prompt protective action, prioritizing the child's best interest and safety, and will immediately refer the matter to competent authorities.

Where a safeguarding concern involves a Partner, FIND shall require immediate and appropriate protective measures, preservation of evidence, investigation and corrective action. Depending on the concern and the Partner's response, FIND may suspend activities while investigation or safeguarding concerns are being and/or suspend or terminate the engagement immediately depending on response and nature of the issue.

FIND will not knowingly engage or continue collaboration with a Partner whose conduct presents an unacceptable safeguarding risk that has not been adequately addressed through corrective and preventive measures.

When interacting with children in FIND-related activities, FIND Personnel and Partners shall:

- treat children with dignity and respect, recognizing their rights, background, culture and beliefs;
- maintain age-appropriate and professional boundaries and to avoid situations unnecessary one-to-one situations with a child; where reasonably possible, interactions should involve a parent, guardian or another appropriate adult;
- communicate respectfully and professionally, using language that is appropriate to the child's age, maturity, communication needs and context;
- use only authorized communication channels when communicating directly with children in connection with FIND activities;
- communicate with the approval or involvement of parent or guardian
- not use or tolerate child labour in connection with FIND activities;
- not subject a child to verbal, physical, emotional, psychological or sexual abuse or neglect;
- not engage a child in or expose a child to sexual activity or sexual materials;
- not engage in exploitative activity involving children, including child labour, human trafficking or coercion;
- refrain from any conduct that may cause or create risk of harm to children.

FIND expects the physical and moral integrity of children to be respected at all times. As such, identifiable images or recordings of a child in connection with FIND activities may only be taken, used or shared for legitimate purpose and in accordance with applicable law, ethical requirements and FIND procedures. Informed consent from a parent or legal guardian and, where appropriate to the child's age and maturity, the child's assent shall be obtained, unless a lawful and approved exception applies. Images and other recordings must always respect the child's dignity, privacy and safety.

Group, event or crowd images must follow the applicable communications, privacy and project or research requirements. There is no blanket exception from consent requirements merely because an image contains a group.

When clarification is needed, FIND Personnel and Partners should seek guidance from the FIND Communications Department, including advice on the protection of personal data and secure handling of digital images.

6.3. Safeguarding Vulnerable Adults

FIND will take reasonable and proportionate measures to prevent and respond to safeguarding harm affecting vulnerable adults in connection with FIND activities or contacts.

Vulnerable adults must be treated with dignity and respect and supported to make informed decisions. Disability, age, illness or social circumstances must not be treated as automatically removing or reducing decision-making capacity.

Where consent is required, an adult with decision-making capacity must consent for themselves. Supported decision-making should be used where appropriate. An appriopriate representative should be involved only where legally required or otherwise appropriate.

FIND Personnel and Partners must not use dependency, access to services, employment, funding, research participation or other positions of power or trust to coerce, exploit or obtain improper organizational, personal or sexual benefit from an adult at risk.

Where an adult at risk may face immediate or serious harm, FIND will consider appropriate protective and referral measures in consultation with the affected person where and to the extent possible and appropriate and in accordance with applicable law.

6.4. Safeguarding in Programmes

Safeguarding requirements shall be proportionate to the activity and should be considered throughout the project and partnership lifecycle. This shall include:

- safeguarding considerations shall be part of a proportionate due diligence and risk assessment;
- ensuring Partners understand their safeguarding related obligations, including immediate reporting and know how to report safeguarding concerns;
- monitoring safeguarding risk and compliance during implementation and addressing material issues and incidents through timely corrective actions, which may include suspension or termination of the engagement.

6.5. Safeguarding in Research and in Clinical Trials

FIND collaborates with Partners who may have direct contact with patients and research participants. Safeguarding requirements, research ethics guidelines and Good Clinical Practice (GCP) are complementary. Compliance with a protocol, ethics or GCP does not replace the compliance with safeguarding obligations.

FIND Personnel and individual Partners working directly with patients or research participants, children or adults at risk shall complete a subject-specific training module (UNICEF). Completion of such training may be required as a condition of engagement, and evidence of completion may be requested.

Institutional, academic, commercial, and other organizational Partners engaged in activities involving patients, research participants, children, or vulnerable adults will maintain safeguarding arrangements appropriate to the nature of their activities and applicable legal requirements. Where such partners do not have formal safeguarding arrangements in place, FIND will require alternative measures to mitigate safeguarding risks. FIND may request confirmation of such safeguarding arrangements as a condition of engagement.

FIND sponsored or supported research involving human participants are governed by established ethical principles for medical research involving human subjects, applicable research ethics requirements and protocols.

Participation in FIND sponsored or supported research must be entirely voluntary. Any form of coercion or exploitation is forbidden. Participation must be based on a freely given, valid informed consent.

Where children participate in research, consent procedures shall follow the approved protocol, applicable ethics requirements and law, using information appropriate to the child's age and maturity. Simplified participant information sheet and assent form with language that is adequate for the age of the minors shall be used, in addition to consent forms for their parents/legal guardian. Project personnel shall work with the child and parent, guardian or legally authorized representative to explain the research clearly for full understanding and voluntary assent and consent before participation.

Photography, recording and use of research participants' images or recordings must follow the approved protocol, where applicable, consent requirements, applicable privacy and data-protection law and FIND requirements, along the following:

- **Respect local customs:** assess and comply with local customs, laws or restrictions for capturing and reproducing personal images.
- **Obtain appropriate informed consent** before photographing or recording by securing written consent. For children, obtain parent or legal guardian consent and where appropriate to their age and capacity, the child's assent. The intended use of images or recordings must be explained.
- **Maintain dignity and respect:** photographs and recordings must portray research participants in a dignified and respectful manner, never in ways that could be perceived as degrading, vulnerable, exploitative or sexually suggestive. Children must always be adequately clothed.
- **Ensure accuracy and integrity:** images and recordings must be honest representations of the context and the facts.

- **Protect identity and data:** ensure file labels, metadata or text descriptions do not contain identifying information about a child when images are stored, transmitted or published in any format.

7. Roles & Responsibilities

The Board and the Board Safeguarding Representative shall provide governance-level oversight of FIND's safeguarding framework; receive periodic safeguarding reporting and oversee serious, high-risk or conflicted matters where escalation to Board level is appropriate.

The CEO and senior leadership are responsible for ensuring adequate safeguarding governance, resources and implementation; supporting the Speak-up culture; and ensuring that material safeguarding risks are addressed.

Programme and project leads are responsible for integrating proportionate safeguarding measures into relevant activities and Partner oversight. Managers are responsible for embedding safeguarding requirements into their teams and escalating concerns appropriately.

All FIND Personnel share responsibility for promoting and upholding safeguarding principles and shall comply with this Policy. Those who interact directly with children or adults at risk shall play a particularly active role in ensuring a safe and respectful environment in relation to these interactions. FIND Personnel must complete required trainings.

Partners are responsible for complying with applicable safeguarding requirements under their agreements with FIND, implementing proportionate safeguards within their activities, promptly reporting relevant safeguarding concerns and cooperating with appropriate review, investigation and corrective action.

Other organization related safeguarding responsibilities:

- **Policy availability:** this Policy will be publicly available on FIND's website.
- **Awareness and outreach**: safeguarding awareness may be promoted through community engagement and communication initiatives. Informational materials - such as videos, flyers, and posters of FIND's safeguarding messages - may be shared with communities, research participants, and field teams to increase awareness and enhance understanding of safeguarding principles at the local level.
- **Reporting mechanism**: maintaining free and safe reporting channel under the Whistleblowing management Mechanism to address and handle safeguarding concerns, provide appropriate feedback.
- **Recruitment**: as part of the recruitment process, FIND will conduct appropriate background checks on short-listed candidates, including a request for such information as criminal record checks with relevant national authorities, to assess any potential safeguarding risks.
- **Training** : all FIND Personnel shall receive safeguarding training as part of onboarding and periodic refreshers.

- **Policy Review**: this Policy shall be reviewed in every two years , or earlier if required, and updated as necessary to reflect material changes in FIND's activities, applicable law, recognized safeguarding practice or related FIND policies and procedures.

8. Reporting and Response

Safeguarding concerns must be raised as soon as possible via the established reporting channels. Where FIND activities involve communities or research participants, project teams shall ensure that reporting ways are reasonably accessible and, where appropriate, available through non-digital, language-appropriate, child-friendly or disability-accessible means. Reports should be made in good faith, and with the intent to protect any individuals whose rights, dignity or safety may be at risk.

Safeguarding reports will be addressed under the Whistleblowing Management Mechanism and the Whistleblowing Policy.

Serious, high risk safeguarding matters, where Board level oversight is needed shall also be escalated to the Board Safeguarding Representative for oversight.

Where a safeguarding concern indicates an immediate or serious risk of harm, FIND will take prompt and proportionate steps to protect affected persons, preserve evidence, provide or facilitate appropriate support, and comply with applicable legal obligations.

FIND will seek to facilitate timely and proportionate support or referral based on the needs of the affected person and the local context. This may include facilitating access to counselling or other psychosocial assistance and making reasonable workplace accommodations where necessary.

FIND may refer safeguarding matters to national law enforcement or child protection authorities in cases involving accusations of a criminal nature and will cooperate with such authorities as required by law.

Safeguarding information will be treated as confidential and shared only on a need-to-know basis or where disclosure is necessary for safeguarding, procedural purposes, legal compliance or another legitimate purpose. Safeguarding records must be stored securely, with access restricted to authorized persons. Retention of records shall be only as long as necessary for the proper handling of the matter and in line with FIND relevant policies and applicable law. Personal and sensitive information should be minimized and transferred securely.

FIND will provide affected persons and reporting persons with appropriate information about the handling or outcome of a safeguarding concern or report, taking into account personal privacy, confidentiality, the integrity of the process, legal restrictions and the rights of other persons.

9. Related Policies and Procedures

- Code of Conduct & Ethics
- Whistleblowing Policy /Whistleblowing Management Mechanism

- Disciplinary Policy
- Gender Equality Policy
- Grievance Procedure
- Research ethics / Good Clinical Practice procedures
- Data protection, information security and records-management requirements
- Communications guidance on images, recordings
- Applicable partner due-diligence, risk assessment and contracting procedures

Document administration

1. Change History

Document version	Section reference	Change from	Change to
1.0	N/A	N/A	First issuance of document
2.0	All	All	Review of the whole document

2. Approvals

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