

LIGHT
FOR THE WORLD



SAFEGUARDING

POLICY

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EXECUTIVE SUMMARY

Light for the World is committed to creating a safe environment for everyone we engage with through our work. This Safeguarding Policy outlines our approach to protecting programme participants, service users, and employees from harm, with a special focus on children and people with disabilities. Key policy points:

Scope: This policy and Code of Conduct applies to all Light for the World entities, employees, representatives, and partners.

The policy is set out over nine interlinked and mutually enforceable standards:

1. **Governance and Accountability:** Establishes clear roles and responsibilities for safeguarding at all levels of the organisation.
2. **Safe People:** Ensures robust recruitment, training, and management processes to minimise risks.
3. **Safe Partnerships:** Requires partners to adhere to safeguarding standards and supports their growth.
4. **Safe Programming:** Integrates safeguarding into all stages of programme design, implementation, and evaluation.
5. **Working with children, women, people with disabilities and communities:** Emphasises participatory approaches and specific protections for children, women, and people with disabilities.
6. **Contextualisation:** Ensures safeguarding measures are adapted to local contexts while maintaining core safeguarding principles.
7. **Reporting and Response:** Outlines clear procedures for reporting concerns and responding to incidents.
8. **Safe Media and Communications:** Protects privacy and dignity in all communications and media activities.
9. **Data Privacy and Digital Safeguarding:** Ensures secure data management and addresses online risks.

Implementation:

- ▶ All employees must understand, sign and adhere to the Safeguarding Policy and Code of Conduct.
- ▶ All employees receive safeguarding training as part of their induction process, and regular refresher training and awareness-raising activities are carried out.
- ▶ Light for the World appoints Safeguarding Focal Points at various levels of the organisation.
- ▶ Accountability for safeguarding is clearly defined at all levels of the organisation.
- ▶ This policy includes a commitment to mandatory reporting of all safeguarding concerns.
- ▶ The policy will be internally reviewed annually and externally audited every five years.
- ▶ We work in partnership with our delivery partners to ensure high safeguarding standards across our work.

Light for the World has zero tolerance for abuse and exploitation. We are committed to continuous improvement of our safeguarding practices to ensure the safety and wellbeing of all individuals involved in our work.

POLICY REVIEW CONTROLS

Policy Details	
Name of Policy	Light for the World Safeguarding Policy
Owner of Policy	Global Safeguarding Lead: International Director People & Culture
Administrator of Policy	Safeguarding Officer
Version	2.0 Previous versions are held by Team Safeguarding
Date Approved by Board	August 2024
Frequency of Review	The Safeguarding Policy will be internally reviewed annually and formally evaluated by an external auditor every five years.

OVERVIEW

Policy purpose

The purpose of this policy is to create a robust safeguarding culture which protects the people we work with and for, including Light for the World employees. We place a special focus on protecting children and people with disabilities from harm. Gender equality mainstreaming is also of high importance. This policy scope includes harm arising from:

- ▶ The conduct of employees and Light for the World representatives
- ▶ The design and implementation of Light for the World's programmes and activities

This policy lays out the commitments made by Light for the World and informs employees and representatives of their responsibilities in relation to safeguarding.

Policy statement

Light for the World believes that everyone we come into contact with, regardless of age, gender identity, disability, belief, sexual orientation, ethnic origin, or other status, has the right to be protected from all forms of harm, abuse, neglect and exploitation. We are committed to providing a safe environment for all employees, free from discrimination on any grounds and from any kind of harassment at work, including sexual harassment and bullying.

Light for the World treats all safeguarding concerns seriously and will investigate all allegations promptly. Any person found to have breached the terms laid out in this Safeguarding Policy and Code of Conduct will face disciplinary action, up to and including dismissal and criminal investigation.

Safeguarding is both an organisational and individual responsibility:

Organisational responsibility – Light for the World's International and National Boards are ultimately accountable for ensuring a strong safeguarding culture across the organisation where the safeguarding policy and protocols are effectively implemented, and employees and representatives feel safe to raise concerns without fear of retribution. All complaints are taken seriously and treated with respect and confidentiality in a timely manner.

Individual responsibility – All those working on behalf of Light for the World have an individual responsibility to uphold safeguarding standards laid out in this policy and Code of Conduct. Light for the World will ensure all employees, representatives and partner organisations understand their safeguarding responsibilities in accordance with this policy.

This Policy has been developed with due regard to the following laws and guidance:

- ▶ The Human Rights Act 1998
- ▶ The United Nations Convention on the Rights of the Child (CRC)
- ▶ The UN Convention on the Rights of Persons with Disabilities (UNCRPD)

What Light for the World means by “safeguarding”

Safeguarding means protecting people's health, well-being and human rights and enabling them to live free from harm, abuse, neglect and bullying. We are committed to protecting all people from harm arising from direct or indirect contact with our employees, representatives or programmes. Safeguarding puts programme participants and service users at the centre of all we do. We understand children, persons with disabilities and women might be at higher risk.

The implementation of safeguarding measures outlined in this policy is required, without exception, across all our programmes and by our employees and anyone associated with Light for the World's work. When Light for the World works with partners, we expect partners to proactively identify, prevent, and guard against all risks of harm, abuse, neglect and exploitation. Light for the World approaches partnership in the spirit of mutual respect and learning. Light for the World provides advanced, accountable, and transparent systems for risk mitigation, reporting, responding and documenting lessons learned.

Safeguarding principles

Duty of Care - Light for the World has a legal and moral obligation to:

- ▶ Take all reasonable steps to prevent foreseeable harm in any activity or interaction we are responsible for
- ▶ Only act within our competence and not initiate operations we cannot do safely
- ▶ Always act in the best interest of our programme participants and service users

Best interest decisions – Based on the principles included in the UNCRC and CRC, decisions will be made in the best interests of affected children, women and men with disabilities. Decisions will be made with consideration of their physical and psychological well-being and the need to prevent or respond to harm to them or others. Best interest decisions will be reached in consultation with the children, women and men with disabilities and those responsible for their care (where appropriate).

Do no harm – We will ensure all actions and decisions are undertaken in a way that minimises any possible harm to people, especially children, women and people with disabilities, as well as ensures they experience the greatest benefits from those actions and decisions.

No place to hide – Abuse thrives on secrecy and abusers tend to seek out organisations with weak communication and accountability structures. Light for the World encourages an open culture where sensitive issues are discussed without fear, where all concerns are taken seriously and responded to in a timely manner, and where risks are identified and addressed appropriately.

Zero tolerance – For Light for the World, zero tolerance means that any violations of this policy or Code of Conduct will be investigated, and any person found to have breached the terms laid out in this Safeguarding Policy and Code of Conduct will face disciplinary action, up to and including dismissal from employment and criminal investigation. All actions and investigations will be conducted with special considerations to the principle of 'do no harm'. Light for the World's Human Resources manual will include details on how to handle policy breaches including country specific considerations and actions.

Scope

This policy applies to Light for the World International and all entities operating under Light for the World or associated to it (associated members). Light for the World International is responsible for the coordination and implementation of this policy. The policy applies to all people employed by or acting as a representative of Light for the World, including full-time, part-time, and fixed term employees, trustees, supporters, interns, volunteers, consultants, contractors, and visitors, including any journalists and celebrities that may collaborate with us. All these people will hereafter be referred to as 'employees' and 'representatives'.

The Safeguarding Policy is to be applied across all organisational activities and in all of Light for the World's programmes. All Light for the World employees and representatives are expected to understand and commit to adhere to this policy.

In addition to complying with the policy, all employees and representatives must sign and will be held accountable to adherence to Light for the World's Code of Conduct.

Light for the World recognises our duty of care to ensure that no one — child or adult (including our employees) — comes to harm through contact and interaction with our programmes or employees. We also recognise our limitations. We are not able to respond to all concerns within the community, but we would support community members to report to the relevant legal authorities.



STANDARD 1 – GOVERNANCE AND ACCOUNTABILITY

Overview of the standard

Light for the World empowers its employees to act with safeguarding in mind by equipping them with the necessary information and skills to identify risks and contribute to the overall aim of keeping people, especially children, women and people with disabilities, safe from harm. Light for the World will ensure that:

- ▶ All employees and representatives receive safeguarding training.
- ▶ All partners receive safeguarding briefings (as a minimum for engagement).
- ▶ Employees with designated safeguarding responsibilities have the skills and knowledge necessary to fulfil their role and receive regular training and support.
- ▶ Safeguarding Focal Points are supported by the Global Safeguarding Lead based at the International Office (IO).
- ▶ Light for the World will internally review the Safeguarding Policy annually and ensure the ‘tools for implementation’ are up to date.
- ▶ Light for the World will commission an external review of the Safeguarding Policy every five years.
- ▶ Gaps in safeguarding are addressed through an appropriately resourced implementation plan.
- ▶ Policy updates are approved by the Assembly of Members.

Whilst all employees have a responsibility for safeguarding, certain people have specific duties, responsibilities, and accountabilities; these are detailed in the table in Annex 1.

This standard is being met when:

- ▶ Significant organisational and operational risks are escalated to Light for the World’s International or National Board.
- ▶ There is a fully trained Safeguarding Focal Point on all Light for the World’s Boards.
- ▶ Safeguarding is a standing agenda item at all Board meetings.
- ▶ Serious safeguarding concerns are escalated to the Global Safeguarding Focal Point and International Board.
- ▶ Serious safeguarding concerns are reported to charity regulatory bodies and donors appropriately and in line with compliance requirements; and
- ▶ Country level quarterly and annual safeguarding reports are produced and shared with the international office.
- ▶ Tools for implementation
- ▶ Role descriptions for all identified roles with additional safeguarding responsibilities.
- ▶ Board reporting template.
- ▶ Global safeguarding tracking log.
- ▶ Serious safeguarding concerns criteria.
- ▶ Tailored training resources for leadership and governance representatives.

STANDARD 2 – SAFE PEOPLE

Overview of the standard

Light for the World ensures that safeguarding is embedded into all human resource activities. We will promote a positive safeguarding culture at all levels of the organisation where employees feel safe and supported in their work and are able to raise concerns without fear of retribution. To meet this commitment, we proactively offer and promote preventative safeguarding measures and provide robust support to all employees and leadership to encourage and enable a respectful organisational culture. Light for the World implements stringent safeguarding procedures when recruiting, managing and deploying employees. We ensure that our recruitment processes minimise the risk of engaging anyone unsuitable to work with children, women, and people with disabilities. We ensure we recruit employees who share Light for the World's values and are committed to safeguarding.

Employment checks

A minimum of two reference checks are taken for all employees. All roles are categorised as requiring 'standard' or 'enhanced' checks. In countries where police checks are not available or are unreliable, additional reference checks will be carried out and a self-declaration form will be required.

All role adverts will clearly state Light for the World's commitment to safeguarding and all interviews will include at least one question relating to safeguarding.

Training / Prevention Measures

All employees receive induction training on safeguarding within one month of starting work, or sooner if their role requires contact with children, women, and women and men with disabilities.

All employees will receive safeguarding refresher training every two years as a minimum. Additional tailored training is provided where the need is identified. All employees receive regular communications on safeguarding.

All employees have access to the resources and tools necessary to execute their responsibilities.

Light for the World representatives

All representatives must sign Light for the World's Safeguarding Policy. Expectations regarding safeguarding are explained in a briefing prior to any visit which involves direct or indirect contact with children, women and women and men with disabilities.

This standard is being met when:

- ▶ All employees read, understand and sign a commitment to adhere to Light for the World's Safeguarding Policy and Code of Conduct prior to commencing work.
- ▶ All employees feel safe in their work and are confident to and understand how to raise a concern if something doesn't feel right.
- ▶ Compliance with the Safeguarding Policy is included in all employment contracts.
- ▶ All employees receive induction training on safeguarding within one month of joining.

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- ▶ Employees with specific responsibilities for safeguarding receive regular tailored training and have access to the resources and tools necessary to execute their responsibilities.
 - ▶ All safeguarding training received by employees is signed by the recipients and these records are kept by Light for the World on the respective personal file.
 - ▶ Background checks are required for all employees. In contexts where police checks are not reliable, employees are asked to self-declare criminal convictions on the understanding that false declarations are subject to disciplinary measures.
 - ▶ Background checks or sanction list checks are renewed regularly, role dependent.
 - ▶ Two references are taken for all employees and representatives.
 - ▶ An all-employees log is kept up to date which tracks an employee's background checks, renewal date and training undertaken.

Tools for implementation

- ▶ Example safeguarding questions for interviews.
- ▶ Reference request form.
- ▶ Level of background check and renewal schedule criteria.
- ▶ Self-declaration form (criminal record).
- ▶ Training tracking log.
- ▶ HR Manual.



STANDARD 3 – SAFE PARTNERSHIPS

Overview of the standard

Light for the World has a spirit of mutual respect and learning approach to partnerships. We will share our safeguarding policies and procedures and ensure that all partners have the appropriate safeguarding measures in place to prevent harm to children, women and women and men with disabilities, and to respond effectively whenever safeguarding concerns are identified. Safeguarding will be included as part of Light for the World's due diligence checks on new partners and embedded into monitoring and evaluation processes. Where Light for the World is working as a consortium partner, we will work with the consortium lead and partners to agree safeguarding standards and protocols which complement our own and ensure compliance with these safeguarding standards and protocols.

Duty of care: Light for the World has a legal and moral obligation to take all reasonable steps to prevent foreseeable harm in any activity or interaction it is responsible for. This includes a responsibility to ensure that Light for the World, and partners acting on our behalf, have the capacity and competence to fulfil their obligations safely and have the policies and procedures in place to prevent harm or abuse to children, women and women and men with disabilities.

Due diligence: Light for the World's International Board is legally accountable for ensuring that the organisation's funds are used properly and for ensuring that due diligence checks are conducted to identify and verify who partners are, ensure they have the capacity and skills to deliver initiatives safely, and monitor their activities and conduct. This responsibility is led by the Light for the World national office employees leading the relationship with the partner or supplier and is coordinated with the following teams: People & Culture, Finance & Operations, Quality & Innovation, Governance & Compliance with support from the Safeguarding Team.

Implementation

Light for the World will co-create a safeguarding agreement with all partners delivering work directly with programme participants or service users. This agreement will detail how safeguarding principles will be implemented including reporting concerns.

Due diligence checks will assess the partner's safeguarding policy and procedures. Where a partner's safeguarding standards and practices do not meet Light for the World's, the safeguarding agreement will include details of how the implementing partner intends to meet these standards. This could include Light for the World supporting partners in the development of their own safeguarding policies that are adapted to their local context and working environment, providing training, and sharing tools and guidance. Light for the World will only work with partners who meet their safeguarding standards or have a clear timebound plan in place to meet these standards.

Monitoring

Safeguarding reporting will be contractually built into partnerships. Programme partners are required to regularly (minimum annually) report on measures taken to enhance and embed safeguarding systems, including training, policy development, referral service mapping, etc. Programme partners are also required to report safeguarding concerns to Light for the World in line with the process laid out in Standard 7, Reporting and Response.

This standard is being met when:

- ▶ All partners undertake Light for the World's due diligence process which includes safeguarding.
- ▶ Safeguarding is embedded into Light for the World's monitoring and evaluation processes for partners.

- ▶ Where a partner does not have safeguarding policies and protocols in place, or they fall short of Light for the World's standards, the contract explicitly includes a commitment to work towards Light for the World's policy and protocols, taking a proportionate approach.
- ▶ All partners provide a safeguarding briefing on their policies and procedures and receive a safeguarding on-boarding on Light for the World's Safeguarding Policy and Code of Conduct.
- ▶ A Safeguarding Agreement which details how the partner aims to meet international standards (on and offline) is completed and signed prior to any work taking place. Safeguarding Agreement includes:
 - ▶ Data sharing agreements.
 - ▶ Agreements covering digital/data breaches.
 - ▶ Commitment for all staff to adhere to Light for the World's Code of Conduct.
 - ▶ Agreed reporting and response and escalation process.
 - ▶ Named safeguarding focal points in both organisations.
 - ▶ National laws where relevant to safeguarding e.g. mandatory police reporting.

Tools for implementation

- ▶ Due diligence guidelines.
- ▶ Safeguarding Agreement Template.
- ▶ Example safeguarding text for programme partner contracts.
- ▶ Light for the World Safeguarding Policy and Code of Conduct.

STANDARD 4 - SAFE PROGRAMMING

Overview of the standard

Light for the World ensures safeguarding is built into all proposals, project design and implementation including research and advocacy programmes. Safe programming promotes equality, equity, reduces risk and increases protection. Light for the World is committed to ensuring the participation of programme participants, service users and communities in the design and monitoring of our programmes as part of our commitment to accountability to affected populations.

Proposal design and development

We commit to ensuring all Light for the World proposals include a safeguarding risk assessment detailing risk mitigation measures. All programmes must have access to sufficient budget for implementing safeguarding processes including (as identified in the risk assessment), safeguarding training, localised service mapping and case management. Where proposals are developed as part of a consortium, due diligence processes are followed that assess partner safeguarding practices. Where a partner's safeguarding policies and procedures do not align with Light for the World's, the partner will be required to adopt and follow Light for the World's policy and/or procedures.

Participation

Light for the World commits to ensuring the safe and meaningful participation of programme participants, service users and communities in the design, risk assessments and monitoring of our programmes. Light for the World ensures that participation takes into account individual needs, and we are committed to ensuring reasonable adjustments are made to enable full and active participation. Light for the World ensures that our employees, representatives and partners (in the spirit of mutual learning) understand the concept of ethical and meaningful engagement. All those working on behalf of Light for the World are required to sign up to our Code of Conduct (annex 1) which clearly outlines the behaviours and values we expect.

Programme implementation

Light for the World will ensure that the Country Level Safeguarding Focal Point has sufficient time and capacity to fulfil their role as the main Safeguarding Focal Point for programmes within the country. Duties include (but are not limited to);

- ▶ localised risk assessments and mitigation measures,
- ▶ developing accessible reporting and response mechanisms with programme participants and communities,
- ▶ accessible communications of safeguarding protocols, to participants, community, employees and partners,
- ▶ safeguarding case management,
- ▶ supporting accountability to affected populations processes.

The Safeguarding Focal Point will report into a member of the Senior Management Team where Light for the World has an office or to the Global Focal Point in Vienna where there is no country office. In countries with multiple large programmes, it may be necessary to recruit programme level Safeguarding Focal Points who will report into the Country level Safeguarding Focal Point.

Safeguarding awareness-raising will be incorporated into activities for programme participants including children, women and people with disabilities and caregivers, teachers, etc. All programmes will hold regular open discussions with employees, participants, representatives and partners to evaluate the implementation of safeguarding procedures throughout the implementation period of the programme.

Monitoring

Light for the World ensures that the implementation and effectiveness of safeguarding measures within programmes are regularly reviewed and updated if needed. Country level annual reports should summarise progress made on the implementation of safeguarding practices, including lessons learned that will inform future programmes. Reports will include a summary of the country level safeguarding incident log to identify any emerging trends and thereby strengthen our prevention and response mechanisms.

This standard is being met when:

- ▶ Safeguarding risk assessments and mitigation plans are produced prior to the start of every programme and are reviewed and updated throughout the duration of the programme.
- ▶ Safeguarding activities are adequately budgeted for in project proposals.
- ▶ The Country Level Safeguarding Focal Point has sufficient time and capacity to fulfil their role as the Programme Level Focal Point.
- ▶ Where there is identified need (e.g. multiple programmes in one country), Light for the World will budget for a Programme Level Safeguarding Focal Point.
- ▶ A variety of context specific reporting mechanisms are in place which have been developed in consultation with, and are well known to, programme participants, service users, communities, employees and representatives.
- ▶ Monitoring – Country level quarterly and annual reports are produced and shared with the International office.

Tools for implementation

- ▶ Proposal development checklist.
- ▶ Risk assessment templates.
- ▶ Safeguarding budget guidance for funding proposals.
- ▶ Due diligence process for consortium working.
- ▶ Safeguarding Focal Point role descriptions.
- ▶ Code of conduct.

STANDARD 5 - WORKING WITH CHILDREN, WOMEN AND PEOPLE WITH DISABILITIES AND COMMUNITIES

Overview of the standard

Light for the World ensures our programmes are developed with the 'do no harm' principle at the forefront of planning. To fully implement this principle, the safe, inclusive and participatory involvement of programme participants and service users is at the heart of Light for the World's work. We will work with programme participants, service users and communities to develop accessible confidential safeguarding reporting and feedback mechanisms and ensure all people that come into contact with Light for the World understand their right to raise a concern if something doesn't feel right. Light for the World integrates safeguarding across all its work and mitigates risk to prevent harm and abuse from occurring as well as creating opportunities for programme participants and service users to play a central role in shaping our programmes and their experiences.

Risk assessments

For any physical and digital programmes managed by Light for the World or a partner organisation, a risk assessment must be completed and regularly updated as part of the project management cycle. Risk assessments must include all safeguarding risks. For one-off activities such as advocacy events, visits or pieces of research, a risk assessment must be completed as part of the planning and preparatory phase. This applies to both digital and physical activities.

Risk assessments must be reviewed by the Safeguarding Focal Point prior to the start of the programme or activity. Where safeguarding risks continue to remain high once mitigation strategies have been identified, the risk will be escalated to the IMT member accountable within the organisation to approve, prior to the start of the programme or activity.

Working with partners

The safety and security of employees is of the highest priority to the organisation. This duty also extends to our partners and the communities with whom we work. While we cannot directly manage the activities of our partners, we have an obligation to ensure they are able to manage safety and security risks to a level we deem acceptable. This must not be assumed and the inherent liability to manage these risks effectively cannot simply be transferred via written contract alone. Where gaps in safety and security risk management are identified, we will work with our partners to assist their delivery of our programmes without endangering the communities we support.

Do no harm

No Light for the World activities should place any programme participants, service users or communities in harm's way. Programme planning and risk management will be an integrated process that considers the possible negative consequences of programme implementation and/or closure. Light for the World recognises however that people may face higher safety and security risks due to their role, gender, nationality, disability, ethnicity, religion or belief, race, sexual orientation, or any other protected characteristics. Light for the World may therefore choose to apply different approaches to managing these risks in order to afford people the same opportunities regardless of distinction or discrimination.

Programme visits

Light for the World regularly facilitates programme visits by donors, trustees and supporters. Expectations regarding safeguarding are explained in a briefing prior to any visit which involves direct or indirect contact with children, women and women and men with disabilities. Minimum requirements for programme visits include but are not limited to:

- ▶ Travel arrangements organised well in advance of the travel date to ensure the participating community is fully informed and agrees to the arrangements.
- ▶ A risk assessment must be completed including identifying a safeguarding focal point in the visit team, identifying potential safeguarding risks for all participants (visitors, communities, programme participants), and mitigation measures put in place.
- ▶ The risk assessment should be shared with the global safeguarding team who will — if needed — join the pre-visit briefing and post-visit de-briefing. The global safeguarding team will also provide a briefing to the identified visit safeguarding focal point.
- ▶ Visitors must receive a safeguarding briefing both prior to travel (from the safeguarding focal point) and on arrival in that country (from the country level safeguarding focal point or employee identified in the risk assessment).
- ▶ Visitors must read, understand and sign this safeguarding policy and Code of Conduct.
- ▶ The participating community, children, women and women and men with disabilities involved in the visit should receive a safeguarding briefing that includes Code of Conduct and how and where to report concerns.
- ▶ Upon returning from an international visit, a debrief session will be held with the participants to solicit feedback on what they feel could be improved.

This standard is being met when:

- ▶ Risk assessments are conducted prior to the start of any programme, activity or programme visit involving children, women and women and men with disabilities, with safeguarding mitigation measures put in place.
- ▶ A safeguarding focal point is identified for all international visits who is supported by the global safeguarding team.
- ▶ All international visitors receive a safeguarding briefing prior to travel and on arrival in the programme country.
- ▶ All international visitors read, understand and sign Light for the World's safeguarding policy and Code of Conduct.
- ▶ Host countries ensure that children, women, women and men with disabilities and communities who will be visited receive a safeguarding briefing.
- ▶ People-friendly safeguarding information is produced and shared.
- ▶ Programme participants and service users are engaged in programme design and are regularly asked to provide feedback about their experiences and ideas for how it can be improved.

Tools for implementation

- ▶ Risk assessment templates.
- ▶ Safeguarding briefing deck for visitors and communities.
- ▶ How To Guide: developing community feedback and safeguarding mechanisms.
- ▶ Simple, user-friendly safeguarding information is translated into local language including Safeguarding Policy and Code of Conduct, (braille, pictorial, large print, audio – depending on need)

STANDARD 6 – CONTEXTUALISATION

Overview of the standard

Light for the World's International office is located in Austria and works in a variety of contexts across the world. Each country, including Austria, has different legal, cultural and social contexts. Light for the World will ensure country context mappings and localised mappings are developed as part of country plans, recognising varying needs of different Light for the World programme participants and service users.

Universality: Light for the World believes in the concept of universality; every person has the right to be protected from all forms of harm, abuse, neglect and exploitation irrespective of age, gender identity, disability, belief, sexual orientation, ethnic origin, or other status.

Respect for local laws and customs: Light for the World operates in diverse contexts and suspected harm to children or young people must be responded to and investigated in the context of local laws and customs. However, Light for the World is committed to challenging social norms and local customs where they contradict the principles laid out in the UN's Human Rights Act, Convention on the Rights of the Child or the Convention on the Rights of Persons with Disabilities.

What should the Country Context mapping include?

The mapping identifies, as a minimum:

- **The legal framework:** A summary of legislation governing welfare/safeguarding/protection of people with disabilities (adults, children and young people) including mandatory reporting laws, international conventions to which the country is a signatory or has ratified. (e.g. UN Convention on Rights of the Child), brief analysis of extent of implementation/enforcement of legislation, etc.
- **An overview of the main protection risks:** Prevalence of different forms of harm, including cultural practices that may be harmful (e.g., female genital mutilation (FGM), child labour) and details of any locations where this is known/believed to be particularly prevalent.
- **Community attitudes, disability and gender norms, customs and practices** which relate to safeguarding, e.g. limited access to health or education services. Local attitudes towards abuse and protection (e.g. possible reprisals towards survivors).
- **Criminal investigation/prosecution, police and judiciary:** Brief analysis of enforcement, including mandatory reporting, likely response, any associated costs and any risks associated with engaging police/judiciary. Location and contact details of police and judicial services, including details of gender desk where available.
- **National employment laws** including managing misconduct.
- **Non-statutory service provision:** Details of health and other services provided by NGOs and other service providers, including referral criteria, costs and a brief assessment of service quality where known.
- **Details of informal and community-based protection mechanisms** and how these function and brief assessment of their effectiveness. Key community figures who can be contacted to provide support for protection.
- **An agency that children, women and people with disabilities and their support workers can contact** to discuss safety concerns and seek advice (e.g. a recognised and approved toll-free helpline).
- **An emergency number** that children, women and people with disabilities can contact if they are at immediate risk of harm.

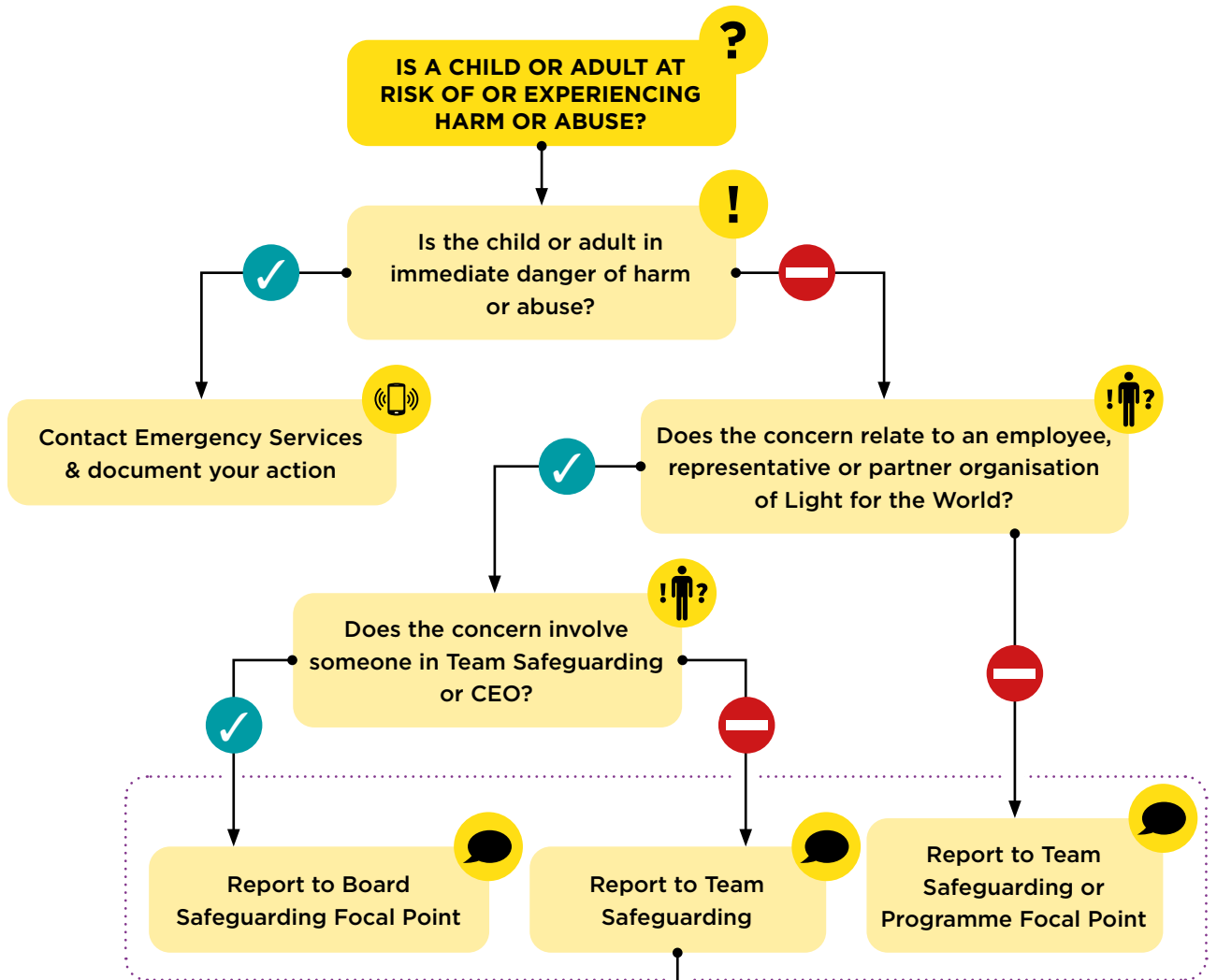
This standard is being met when:

- ▶ A country context mapping is developed for each country where Light for the World has programmes and for our international office in Austria. This is updated annually or if a national emergency is declared. The mapping is signed off by the Country Lead and the Global Safeguarding Team.
- ▶ The Safeguarding Policy and Code of Conduct is translated into national languages.
- ▶ Country specific internal lines of accountability and external reporting procedures (compliant with national laws and reflective of the availability of local services) are produced.
- ▶ Easy-read versions of the Safeguarding Policy and Code of Conduct are produced.
- ▶ Light for the World has a good understanding of national law in relation to safeguarding and employment. Human resource processes are aligned to national laws.

Tools for implementation

- ▶ Country context mapping template.
- ▶ People-friendly fact sheets – detailing available support/referral services.
- ▶ People-friendly summary of safeguarding policy and Code of Conduct.
- ▶ Visit risk assessment template.

STANDARD 7 - REPORTING AND RESPONSE

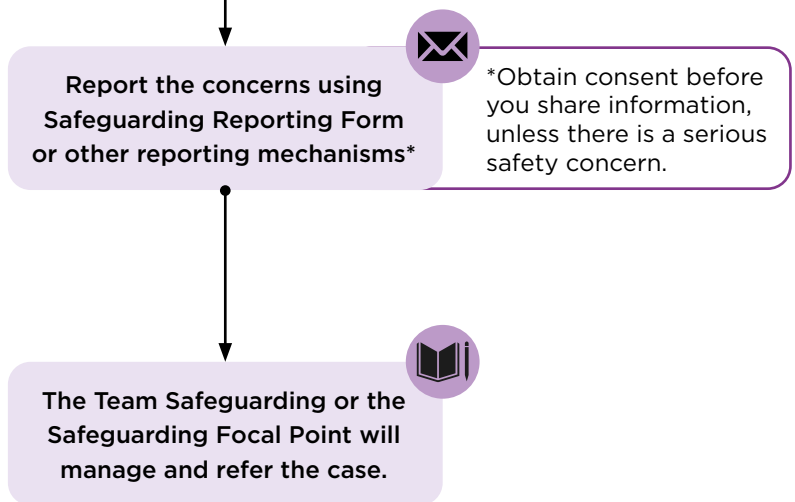


CONTACT DETAILS

Team Safeguarding:
 safeguarding@light-for-the-world.org

Board Focal Point
 board-safeguarding@light-for-the-world.org

Link to Safeguarding Reporting Form:
 Klick here



Light for the World will ensure that internal reporting mechanisms are accessible and well-known to all employees and representatives. Light for the World also commits to ensuring a variety of accessible reporting mechanisms are developed for all programmes based on programme participant needs. All safeguarding concerns are reported through a clear reporting structure and responded to promptly and in a way that safeguards the best interests of children, women and people with disabilities including Light for the World employees. We recognise our accountability to affected populations and will develop reporting mechanisms together with our programme participants and service users.

Receiving a safeguarding concern

If you receive a concern:

- ▶ Listen to and reassure the person reporting the concern.
- ▶ Confirm facts.
- ▶ Remain calm, and non-judgemental!
- ▶ Do not ask leading questions.
- ▶ Ensure that the complainant understands the organisation's safeguarding procedures for dealing with safeguarding concerns including your duty of care to report onwards.
- ▶ Keep a confidential record of the discussion.
- ▶ Report the concern to the Safeguarding Focal Point.
- ▶ Uphold confidentiality — DO NOT discuss the concern with other colleagues.

Ensuring health and well-being: Light for the World takes seriously its role to ensure all those affected by harm and abuse are supported in accessing relevant and appropriate care and support services (e.g. medical, psychosocial, legal).

Response

All safeguarding concerns will be treated with the highest degree of confidentiality and responded to promptly and in a way that safeguards the best interests of children, women and people with disabilities including Light for the World employees. Light for the World applies a survivor-centred approach which places the rights, wishes, needs, safety, dignity and well-being of the survivor at the centre of all response measures concerning abuse, harm or exploitation.

Mandatory internal reporting: It is the responsibility of all employees and partners to take seriously any concerns, complaints, allegations, suspicions and incidents involving Light for the World's programme participants, service users and employees. Reporting these concerns to one of the designated employees responsible (list below) is a mandatory requirement in Light for the World. Failure to report will be considered a serious breach of Light for the World's Safeguarding Policy and appropriate action will be taken.

Proportionality: Light for the World encourages an open culture where all concerns are taken seriously and where sensitive issues are discussed confidentially and without fear. Mandatory reporting does not mean that all concerns raised will be formally investigated.

Organisational responsibility: The responsibility for decisions and actions rests with Light for the World as an organisation and not with any individual. Employees and any other representatives of Light for the World must not act in isolation but must consult with the designated Safeguarding Focal Point or the Global Safeguarding Team before taking any action in response to safeguarding concerns. Serious safeguarding concerns will be managed by a safeguarding case

management committee (formed in response) and all serious safeguarding concerns will be escalated to the CEO and the Designated Safeguarding Board Member. In the case of serious safeguarding concerns Light for the World adheres to mandatory reporting to donors and/or other statutory bodies.

Concerns about harm or abuse must be internally reported where:

- ▶ The subject of complaint (SOC) is a Light for the World employee, representative or an employee of a partner organisation.
- ▶ The SOC is a programme participant or service user, although responses should take in to account the protection and safety of both the SOC and the complainant.
- ▶ The abuse is historical. Most abuse is not disclosed until many years after it has occurred but the risks of harm to children, women and women and men with disabilities may persist and require investigation.
- ▶ The report is anonymous as this does not automatically mean that it bears less substance but may indicate fear of reprisal, shame or other barriers to disclosure. Anonymous reports should be taken as seriously as 'named' reports, although the extent to which they can be investigated may be limited by the anonymity.

Ways to report

Standard 5 details how Light for the World will work with programme participants, service users and communities to establish accessible and confidential reporting pathways, ensuring we remain accountable to them.

As a Light for the World employee or representative of a partner organisation, if you observe or receive a report of harm or abuse, listen, and confirm facts. Where possible, ask the person what they want to happen and ensure that the complainant understands the procedures. Report the concern to:

- 1. Email: safeguarding@light-for-the-world.org**
- 2. Verbally or in writing to one of the designated employees:**
 - ▶ Line Managers
 - ▶ Safeguarding Focal Point (programme, country or global)
 - ▶ International Director of People and Culture
 - ▶ If your concern involves the CEO, you may approach the Board Focal Point or Chairperson of the Board for Light for the World International
- 3. Light for the World Workers Council (in entities where this exists)**
- 4. Use the anonymous whistleblowing hotline (to be implemented by end of 2024)**

All channels can be used equally, and all concerns are valid. Employees with specific responsibilities for safeguarding receive regular tailored training and have access to the resources and tools necessary to execute their responsibilities.

Response

All safeguarding concerns will be treated with the highest degree of confidentiality and responded to promptly and in a way that safeguards the best interests of children, women and people with disabilities including Light for the World employees. Light for the World applies a survivor-centred approach which places the rights, wishes, needs, safety, dignity and well-being of the survivor at the centre of all response measures concerning abuse, harm or exploitation.

This standard is being met when:

- ▶ Each Light for the World Country Office and National Entity has a detailed reporting procedure which; takes into account Light for the World's commitment to accountability for affected populations, is clear and known to employees, partners, programme participants and service users so that they know who their Safeguarding Focal Point is and the ways in which they can report concerns.
- ▶ All Light for the World employees are aware that psychosocial support, coaching or mentoring can be offered as an appropriate measure of case management or follow-up (e.g. for workplace bullying issues, sexual harassment, grief).
- ▶ Light for the World has an external Whistleblowing helpline.
- ▶ Safeguarding Focal Points use Light for the World's Safeguarding Report Form to record all safeguarding concerns. The form is submitted to **safeguarding@light-for-the-world.org** and is updated with case outcomes and learning.
- ▶ All concerns are responded to in a timely (within 48 hours) and confidential manner with the best interests of the people affected in mind.
- ▶ An emergency escalation process is in place enabling immediate response for serious concerns (add Link).
- ▶ The safeguarding case management system is survivor-centred and considers mandatory reporting risks and the best interests of the individual.
- ▶ Country context mapping of referral services are developed and updated annually.
- ▶ All concerns relating to Light for the World employees, representatives or partners are investigated and appropriate action is taken.
- ▶ A Global Safeguarding Register is kept up to date and analysed to ensure effective case management and organisational learning is streamlined.
- ▶ Data on the Global Safeguarding Register is analysed regularly by the Global Safeguarding Lead who provides a report to the International Board on a quarterly basis.
- ▶ Details of concerns are treated with the highest degree of confidentiality and only shared with the minimum number of people necessary to ensure the safety of the individual.
- ▶ Records from safeguarding cases are kept for a minimum of ten years.

Tools for implementation:

- ▶ Safeguarding Concern Reporting Form.
- ▶ Reporting & Response Procedure Flow Chart.
- ▶ Guidance for line managers, Workers Council, and all employees receiving reports.
- ▶ Case management committee terms of reference.
- ▶ Templates and guidance for developing a variety of reporting mechanisms with programme participants and service users.
- ▶ Country Context Mapping Template.
- ▶ Case management guidance and process.
- ▶ Guidance on making best interest decisions.
- ▶ Internal Global Register of Safeguarding Concerns and Responses.
- ▶ Psychosocial Care Protocol
- ▶ Emergency Number Protocol

STANDARD 8 - SAFE MEDIA AND COMMUNICATIONS

Light for the World will take every precaution to preserve the privacy and dignity of the people we work with and for to ensure they are not exposed to risk as a result of their involvement in Light for the World's publicity activities, communication materials or campaigns.

Best interest: The public use of images and stories of programme participants and service users inevitably poses potential risks. Where there is a risk of potential negative consequences for programme participants or service users, Light for the World will make 'best interest' decisions which favour their safety and protection.

Dignity: In all communications, Light for the World will seek to uphold the rights and dignity of children, women and people with disabilities, their family, and the wider community. We will not use language and images that stereotype, degrade, victimise or shame programme participants or service users.

Accuracy: Light for the World's portrayal of people or groups will not be manipulated or sensationalised in any way, but instead should provide a balanced depiction of their life and circumstances. After 5 years, photos and case studies will be archived, to maintain an accurate portrayal of our work.

Consent: Informed consent for photographs, video or personal information is always obtained.

Where the individual is under 18, consent will be obtained from both the child/young person and their parent/caregiver.

Where the individual is over the age of 18 and deemed capable of making an informed decision, they can provide consent.

Every effort will be made to ensure adults with disabilities are supported to provide informed consent. However, where this is not possible, informed consent will also be sought from their care provider. Capacity for making an informed decision around consent will be assessed on a case-by-case basis.

This standard is being met when:


- ▶ We take special care to portray children, women and people with disabilities with accuracy, dignity and with their privacy in mind. This means all media is reviewed from a safeguarding perspective.
- ▶ Informed consent for photographs, video or personal information is always obtained from the individual.
- ▶ Light for the World age guidelines for collecting consent are adhered to.
- ▶ All images and stories of programme participants and service users are securely stored alongside consent on Light for the World's asset management system.
- ▶ Loss or potential loss of data is reported to **it-support@light-for-the-world.org** or other designated staff in line with Light for the World's data privacy protocol.

In all circumstances, consent must demonstrate that the individual understands:

- ▶ How their photo and/or information may be used and for how long, and by whom.
- ▶ Who will be able to view it e.g. external publication, internal report, etc.
- ▶ What measures are in place to ensure that their privacy is upheld.
- ▶ That their consent is voluntary.
- ▶ That they have the right to decline or withdraw consent at any time.

- ▶ That after publication, should they choose to withdraw consent, Light for the World will remove the photograph and/or video from our own digital platforms, however, for web content, we cannot control where or who may have viewed and saved images or videos externally and, for hard copy publications, they may still be in circulation.
- ▶ Consent documentation is stored securely alongside the data, stories, photos or other digital assets.
- ▶ Images and stories are held securely, and access restricted to the minimum number of people.
- ▶ Consent is provided for use of images and stories over a 5-year period after which the images/stories are archived unless consent extension is gained.

Tools for Implementation:

- ▶ Light for the World data privacy protocol.
 - ▶ Guidelines on ethical image sharing.
 - ▶ Consent form templates and guidance – child, youth and adult templates.
 - ▶ Guide for obtaining informed consent.
 - ▶ Digital risk assessment and guidelines.
 - ▶ Training slides on safe media and communications.
 - ▶ Light for the World's asset management system.
- 

STANDARD 9 - DATA PRIVACY AND DIGITAL SAFEGUARDING

Light for the World will ensure that we have measures in place to securely collect, process and manage data and that our digital platforms and services are safe, secure and do not result in inappropriate or unethical capture and/or use of data on children, young people or adults.

Do no harm: Data collected about or from programme participants or service users will be used in ways that respect their privacy and minimises the risk of harm. Light for the World will consider the people most at-risk of harm as the baseline for determining privacy, safety and security policies and practices. In cases where the risk to the user is unclear, Light for the World will err on the side of risk prevention and mitigation.

Data minimisation: Only data that is directly relevant and necessary to accomplish Light for the World's stated purposes will be collected from programme participants or service users.

Access to data: Access to data will be restricted to employees that need access to accomplish their tasks. No data will be used for any purposes without informed consent given.

Privacy: Light for the World will never reveal personal or identifiable information about a programme participant or service user. For example, when we share images on our online platforms, in our publications or any public space, the maximum information given about a child, young person or adult is their first name and the country where they live.

This standard is being met when:

Ethical access to and use of data

- ▶ Data is only stored or hosted using cloud-based services that are password protected and encrypted.
- ▶ Authorised access to data is only given to employees that require the data to perform their duties.
- ▶ Children, young people's and adults' data is only transferred by authorised means, e.g. VPN, SSL or cloud services.
- ▶ A written agreement is in place to control and authorise the release of information on Light for the World's programme participants and service users (data, images, etc.) to partner organisations, on the Internet, into the public domain or to any third party. The sign-off includes a written assessment of the need/benefit of sharing information and is balanced against potential risks.
- ▶ Copyright and ownership issues for digital data, photos, stories and other digital assets are clearly defined and explained both to those collecting data and those providing it during contracting and/or at the point of requesting informed consent.
- ▶ Loss of data on programme participants or service users (e.g. lost laptops, pen drives, etc) is immediately reported to the local Safeguarding Focal Point and the Global Safeguarding Team.
- ▶ Responding to a data breach is clearly laid out in the risk assessment and mitigation plan and includes a commitment to following national legislation and reporting to the relevant regulating bodies.
- ▶ Security and Safety
- ▶ A risk assessment is completed prior to launching any digital platform (this may include running a test pilot). Where high risks are identified, activities do not proceed until a risk mitigation strategy is developed that reduces the risk to a medium or low level.
- ▶ Easy Read Terms and Conditions (T&Cs) exist for all Light for the World digital services or platforms. Acceptance is captured in such a way that it is not the default position.

- ▶ Procedures for reporting harm/abuse exist for each digital platform or service and all digital safeguarding concerns or suspected concerns are responded to by employees with digital safeguarding knowledge.

Tools for implementation

- ▶ Social Media Guidelines.
- ▶ Digital Risk Assessment Template & Checklist.
- ▶ Example of 'People Friendly' Terms and Conditions (T&Cs).
- ▶ Information Technology Policy and Manual.
- ▶ Letter of commitment to Data Secrecy & Protection.



ANNEX 1: GOVERNANCE AND ACCOUNTABILITY

International Board of Light for the World

The International Board of Light for the World International is accountable for overseeing the fulfilment of safeguarding responsibilities in all entities operating under the brand of Light for the World. The International Board will:

- ▶ Promote a strong safeguarding culture when all employees feel able to raise concerns.
- ▶ Appoint a Safeguarding Focal Point to oversee the compliance of the core organisation with the standards laid out in the safeguarding policy.
- ▶ Ensure safeguarding is a standing agenda item for the Nominating Governance Committee and the committee whistleblowing mechanism for allegations involving senior leadership or those not addressed appropriately through other mechanisms.
- ▶ Ensure safeguarding is a standing agenda item at all International Board meetings.
- ▶ Receive quarterly safeguarding reports from the CEO.

National Boards

The National Board is accountable for overseeing the fulfilment of safeguarding responsibilities in the national organisation. The National Board will:

- ▶ Promote a positive safeguarding culture within their National Office.
- ▶ Appoint a Board Safeguarding Focal Point.
- ▶ Liaise with the national Director, the Board Focal Point will oversee compliance of the national office with Light for the Worlds' Safeguarding Policy and protocols.

Senior management is responsible for all operational planning and implementation of the Policy.

Chief Executive Officer (CEO)

The Chief Executive Officer (CEO) Light for the World International is responsible for overseeing a positive safeguarding culture and the implementation of policies across the organisation including national office entities. The CEO will:

- ▶ Report annually to the Assembly of Members on the implementation of safeguarding standards.
- ▶ Provide quarterly safeguarding reports to the International Board which include headline updates on open and closed cases with high level detail of types of concerns.
- ▶ Immediately report serious incidents that present organisational or operational risk and need immediate action (for example onward reporting to donors or regulators).

National Directors and Country Directors (NDs and CDs)

National Directors and Country Directors are responsible for ensuring a strong organisational safeguarding culture within their entities. NDs and CDs will:

- ▶ Inform the CEO of serious incidents if they arise in their respective entities.
- ▶ Oversee the case management committee for serious concerns.
- ▶ Ensure they report on safeguarding implementation regularly (minimum annually) to:
 - ▶ their national Boards (National Directors)
 - ▶ their national boards or (where they do not have a national board) the International Office (IO) (Country Directors)

International Management Team (IMT)

The IMT is responsible for promoting a strong safeguarding culture within Light for the World. To fulfil their role, the IMT will:

- ▶ Receive quarterly headline updates on open and closed cases with high level detail of types of concerns.
- ▶ Be notified of serious safeguarding concerns within any Light for the World entity.
- ▶ Have the option to nominate a member to participate on a case management committee for serious safeguarding concerns if deemed appropriate.

Global Safeguarding Lead

The Global Safeguarding Lead is responsible for coordinating best safeguarding practice across the organisation, this role is carried out in collaboration with the Global Safeguarding Team. Responsibilities include:

- ▶ Accountable for ensuring the global tracker for all safeguarding concerns, active and closed cases is up to date.
- ▶ Formally and immediately escalating serious safeguarding concerns to the CEO when:
 - ▶ There is an immediate risk of harm to a programme participant or service user.
 - ▶ A serious safeguarding allegation made against an employee, representative or partner of Light for the World.
- ▶ Co-ordinating safeguarding training across the organisation.
- ▶ Ensuring each country where Light for the World operates has a country context mapping.
- ▶ Producing a monthly analysis of the global safeguarding register for IMT.
- ▶ Responding to all incidents reported to managers, focal points and Light for the World's Safeguarding email (**safeguarding@light-for-the-world.org**) and other channels.
- ▶ Ensuring learning improves safeguarding practice.

Should the Global Safeguarding Lead be absent, an appointed representative from the IMT assumes these responsibilities.

Country Level Safeguarding Focal Points – where Light for the World does not have a Country Office, the programme team will appoint a senior level Safeguarding Focal Point.

Each country (or programme if operating in a country without a country office) will appoint a Safeguarding Focal Point. They are responsible for overseeing policy implementation at national level and local level. Responsibilities include:

- ▶ Translation and sensitisation of Light for the World's safeguarding policy and procedures.
- ▶ Coordination of safeguarding training – ensuring all employees and relevant partners receive adequate safeguarding training.
- ▶ Development of country context mapping and localised mapping (Standard 7).
- ▶ Ensuring there are a variety of accessible reporting mechanisms.
- ▶ Recording and responding to all safeguarding concerns.
- ▶ Escalating all safeguarding concerns to the Global Safeguarding Lead.
- ▶ Immediately escalating serious concerns using the emergency number protocol.
- ▶ Supporting country level case management processes.

Workers Council (WC) – In entities where this exists

The WC plays an important function at Light for the World. They facilitate communication between employees and management, they collect and disseminate information, they foster a sense of community among our diverse population and increase awareness of our policies including safeguarding. Safeguarding-related responsibilities include:

- ▶ Supporting a strong safeguarding culture.
 - ▶ Receiving and escalating concerns to the Global Safeguarding Lead.
 - ▶ Immediately escalating serious concerns using the emergency number protocol.
 - ▶ Ensuring safeguarding is a standing agenda item for meetings with CEO and/or People & Culture.
-



ANNEX 2: CODE OF CONDUCT

Light for the World is committed to creating a safe environment for everyone we come into contact with through our work. This Code of Conduct should be understood and signed by all employees and representatives of Light for the World.

To be applied within and out of working hours

I, (insert name) _____, acknowledge that I have read and understand Light for the Worlds' Safeguarding Policy and Code of Conduct. By signing this document, I agree to:

1. Uphold the principles of Light for the World's' Safeguarding Policy and this Code of Conduct.
2. Report any concerns or incidents in line with procedures set out in the policy.
3. Raise awareness of the policy and Code of Conduct in my work environment.
4. Promote Light for the World's' safeguarding standards, culture and values.

I agree that I will

5. Respect and promote human rights without discrimination of any kind regardless of age, gender identity, disability, belief, sexual orientation, ethnic origin, or other status that has the right to be protected.
6. Help to create and uphold an environment that is safe, positive, and encouraging, where all individuals are listened to and respected as people with respect for local customs and culture.
7. Work in ways that respect national and international laws on human and child rights and adhere to the principles laid out in the UN Convention on the Rights of the Child.
8. Uphold the highest standards of accountability, efficiency, competence, integrity and transparency in the execution my work.
9. Promote an environment of openness and accountability that helps to prevent abuse, including bullying, harassment and sexual harassment, sexual exploitation, abuse of power and corruption. Managers at all levels have particular responsibilities to support and develop systems that maintain this environment.
10. Ensure my language, in a setting where children, women and people with disabilities are involved, is appropriate, understandable and inclusive.
11. Ensure that when photographing, filming or interviewing children, young people and adults, the guidelines within the safeguarding and ethical content policies are followed and that consent has been obtained.
12. Ensure that all confidential information, including reports of breaches of this Code of Conduct, obtained from programme participants, service users or colleagues, is channelled correctly and handled with utmost confidentiality.
13. Ensure teaching or awareness raising activities with children happens in an open environment, where other adults are present or have access to the room.
14. Ensure the use of the 'Two Adult Rule'. This means, when interacting with children, women and people with disabilities in a work context, I will ensure that another adult is always present or within reach.
15. Report any observed breaches of the Code of Conduct in line with reporting procedures laid out in Light for the Worlds' Safeguarding Policy (Line Manager, Safeguarding Focal Point, Workers Council, Country/National Director, Whistleblowing helpline etc).
16. Comply with any investigation led by official bodies (including interviews) and make available any information necessary.

I agree that I will never

17. Abuse my position of power to withhold humanitarian assistance.
18. Give preferential treatment; in order to solicit sexual favours, gifts, payments of any kind, or advantage.
19. Exploit the potential vulnerability of any target group, especially children, women and people with disabilities.
20. Exchange money, employment, goods, or services in exchange for sex, including sexual favours.
21. Use harsh, harmful, threatening, or insulting language when talking to any individual especially programme participants and service users, children, women and women and men with disabilities.
22. Enforce my religious or political views on others.
23. Commit any act that could result in physical, sexual or psychological harm or suffering to individuals.
24. Engage in any sexual activity or marry a child (persons under the age of 18) regardless of the age of consent locally. Mistaken belief in the age of a child is never a defence.
25. Contact programme participants or service users using personal devices including friending or sending or accepting friend requests using information obtained through my work.
26. Be alone with a programme participant or service user. Note: if it is necessary to be alone make sure that others can hear/see what you are doing. This applies to home visits and taking a programme participant or service user for medical or other care in a personal vehicle or taxi.
27. Be involved in bathing or toilet activities except where programme participants or service users are unable to attend to their own personal care themselves and it is part of my role – only then if done openly with another worker within hearing/seeing distance.
28. Engage in inappropriate physical contact with children, women or people with disabilities including overly affectionate touching, holding, suggestive behaviour, rough physical play or inappropriate tickling.
29. Spend excessive time with any individual programme participant or service user or show obvious favouritism.
30. Use physical punishment to discipline or use any form of corporal punishment as a disciplinary measure.
31. Engage children in domestic work. (The ILO Minimum Age Convention states that the minimum age for any kind of work is never less than the age of completion of compulsory schooling and in any case not less than 15 years). This does not include occasional housework, as long as they still go to school and have time to finish their homework, have sufficient time to rest, for leisure time, etc.

Any breach of the Code of Conduct will result in disciplinary action in accordance with the respective terms, conditions, and guidelines of Light for the World.

Any employees purposely making false accusations against another employee will be subject to disciplinary action.

I, the undersigned, agree to adhere to the Light for the World Safeguarding Policy and Code of Conduct:

Name:

Position:

Organisation:

Date:

Signature:



ANNEX 3: DEFINITIONS AND TERMS

A note on language:

Language is important and Light for the World is currently undertaking a collaborative consultation process to identify the terms and language we want to use. For this document, we have chosen terms which we appreciate may not reflect everyone's chosen language. This is an ongoing journey for Light for the World and society at large and we accept that words which are used now, may not be used in the future. For more information, please see **Light for the World's transformative language guidelines**.

Child/Young Person

The term refers to any person below the age of 18.

Programme Participant

Where we are actively engaging with people in our programmes, we describe the people we work with as programme participants.

Service User

In situations where people are directly receiving services or goods, we use the term 'service users', as is used by health and social care providers.

Subject of complaint (SOC)

The person alleged to have perpetrated the misconduct in the complaint.

Survivor

The person who has been abused or exploited. The term 'survivor' is 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 Centred Approach

A survivor-centred approach places the rights, wishes, needs, safety, dignity and well-being of the survivor at the centre of all prevention and response measures concerning abuse, harm or exploitation.

Abuse

Through an action or failing to act, which causes injury, death, emotional harm or risk of serious harm to a child. Abuse can be intentional or unintentional. There are many forms of abuse including:

Physical abuse

Physical abuse is causing deliberate injury to a person including hitting, shaking, throwing, poisoning, biting, burning or scalding, denying food, suffocating or otherwise causing or attempting to cause physical harm to a person. Physical abuse either results in or has a high likelihood of resulting in harm to a person's health, survival, development or dignity.

Emotional/Psychological abuse

Emotional or psychological abuse is the emotional ill-treatment of a person that adversely affects their wellbeing or development. Emotional or psychological abuse includes humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation.

Sexual abuse

Sexual abuse is the involvement of a person in sexual activities which they do not want or truly understand, or to which they are unable to give valid or effective consent. This may involve rape, sexual assault, female genital mutilation, inappropriate sexual contact, or exposure to inappropriate material. It covers all forms of sexual threat, assault, interference and exploitation.

Any kind of sexual activity involving a child constitutes sexual abuse. This includes rape, fondling genitals, masturbation, voyeurism, exhibitionism, exposing a child to adult sexual material, or making them take part in any sexual activity, real or simulated, whether face-to-face, online, or in any other medium.

Neglect

Failure to meet a person's basic needs (such as love, safety, food and warmth) in a way that affects their health, development or safety. Harm is not always intended, but it is a result of inaction e.g. leaving a young child home alone or ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services.

Grooming

Grooming is a tactic where someone methodically builds a trusting relationship with a child or young adult, their family, and community to manipulate, coerce, or force the child or young adult to engage in sexual activities.

Child Labour

Children prematurely leading adult lives, working long hours for low wages under conditions damaging to their health, their physical and mental development, sometimes separating them from their families, frequently depriving them of meaningful education and opportunities for play, which could open up possibilities for a better future. (Note: this does not include teenagers working a few hours to earn pocket money, children helping on the family farm, nor youngsters doing household chores (African Child Policy Forum 2006)).

Sexual Exploitation

Sexual exploitation is any actual or attempted abuse of 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.

Harm in the workplace

We know that employees may be at risk of harm in the workplace, this includes but is not limited to:

Sexual Harassment

Sexual harassment is unwelcome conduct/behaviour of a sexual nature which offends, humiliates and/or intimidates a person. It includes situations where a person is asked to engage in sexual activity as a condition for that person's

employment or receipt of support for funding, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient. Sexual harassment can involve one or more incidents and actions. Sexual harassment may be physical, verbal and non-verbal. Sexual harassment can also include repeated unwanted social invitations for dates or physical intimacy. Condescending or paternalistic remarks. Sending sexually explicit messages (by phone, email or other means).

Harassment

Behaviour that is offensive and intrusive, with a sexual, racial or physical element.

Bullying

Bullying is unwelcome or unreasonable behaviour that demeans, intimidates or humiliates people, either individually or as members of a group. Bullying behaviour, though it can occur in isolated incidences, typically follows a pattern of persistent or intimidating actions.

Unwarranted humiliating or offensive behaviour towards an individual or groups of employees.

A persistent negative or malicious attack on a personal or professional performance, typically characterised as unpredictable, unfair, irrational and often unseen.

An abuse of power or position that can cause such anxiety that people gradually lose all belief in themselves, suffering physical ill health and mental distress as a direct result.

The use of position or power to coerce others by fear, persecution or to oppress them by force or threat. It has been identified as a more crippling and devastating problem for both employees and employers than all the other work-related stresses combined.

ANNEX 4: RELATED POLICIES

Safety & Security Policy

Policy Partnership in Programmes

Transparency & Anti-Corruption Policy

Light for the World's transformative language guidelines

Privacy Policy

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