

**Sisters
Rising
Worldwide**
so all may flourish!

PROTECTION FROM ABUSE AND EXPLOITATION

Sisters Rising Worldwide

Children and Vulnerable Adults Safeguarding Policy

1.1. Purpose

Sisters Rising Worldwide (SRW) recognizes the right of children and vulnerable adults to protection, regardless of gender, diversity, equity and inclusion. SRW recognizes the power dynamics inherent in working with children and vulnerable adults and the potential for staff to abuse and exploit people with whom we work.

SRW is committed to creating and maintaining an environment which promotes its core values and prevents abuse and exploitation of all people. SRW staff¹ and associates² are expected to uphold the dignity of all people with whom they come into contact by ensuring that their personal and professional conduct is of the highest standards at all times.

SRW recognizes the unique needs of children and vulnerable adults and, therefore, commits itself to creating and maintaining an environment that protects these individuals.

1.2. Scope

This policy applies directly to all SRW staff and associates. The SRW Safeguarding and Complaint Handling Officer (SCHO) is a resource for Staff and Associates, when needed.

1.3. Protecting Children and Vulnerable Adults

SRW prohibits all forms of exploitation and abuse, namely:

- SRW staff and associates are prohibited from engaging in sexual activity with children (persons under the age of 18, regardless of the age of majority or age of consent locally). Mistaken belief regarding the age of a child is not a defense.
- SRW staff and associates are prohibited from causing any physical or emotional harm to children or vulnerable adults.
- SRW staff and associates are prohibited from the exchange of money, employment, goods, or services for sex, including sexual favors.

¹ Staff refers to all SRW staff, volunteers, interns and governance members.

² Associates refers to consultants, contractors, and funded project staff

- SRW staff and associates are prohibited from any form of humiliating, degrading, or exploitative behavior toward children, women, and vulnerable adults.
- SRW staff and associates are not to use their power or position to withhold assistance or services, or to give preferential treatment.
- SRW staff and associates are prohibited from using their power or position to request or demand payment, privilege, or any other benefit.
- SRW staff and associates are prohibited from engaging in trafficking in human beings, in all forms.

In the same spirit, SRW staff and associates are strongly discouraged from engaging in sexual relationships with people they work with since they are based on inherently unequal power dynamics. Such relationships are contrary to SRW principles and values and undermine the credibility and integrity of its work.

1.4. Responsibility to report

SRW staff and associates are obliged to report any concern or suspicion of exploitation and abuse of a child or vulnerable adult. SRW staff should report to the formal authorities or, where they are weak or corrupt, to organizations that are able to deal with cases appropriately. The reporting process will need to be decided at a local level and advice and guidance must be sought to ensure that children and vulnerable adults and their families are not put at further risk or made vulnerable by the very action of reporting harm and/or abuse.

It is also required that the SRW SCHO is informed in writing of any accusation of abuse or exploitation of children or vulnerable adults. Failure to report may put the victim and SRW at risk and is a breach of this Safeguarding Policy.

SRW staff and associates should report concerns by a staff from another non-member organization to the SRW SCHO.

1.5 Prevention

SRW is adhering to the highest human resource and recruitment standards to safeguard people we work with against exploitation and abuse. This includes:

- Safe recruitment – referencing and vetting prospective applicants with emphasis on impeccable track record in carrying out their work in conformity with the Code of Conduct.
- Orientation – all staff have completed an orientation session on the SRW Code of Conduct, Complaints and Handling Policy and Procedures, SRW Children and Vulnerable Adults Safeguarding Policy and Standards of Behavior Toward Children and Glossary of Terms.
- Acknowledgment – all staff have read, understood and signed the Children and Vulnerable Adults Safeguarding Policy.

1.6 Information data protection

SRW and its Associates are committed to apply the highest levels of protection in the processing of personnel, associates, and participant information.

It is essential to minimize the risk of inappropriate use of information, stories and visual images (photographs, video or social media) of children and vulnerable adults.

- Images of children and vulnerable adults must not show them in states of undress or in inappropriate poses.
- Details attached to images and included in stories must not allow that child and vulnerable adult to be traced to his or her home or community.
- Distinctive buildings, street signs or landmarks should not be included in an image if they identify where a child and vulnerable adult lives or works.
- Geotagging of images should be disabled when taking photographs.
- Ensure the photographer/journalist/translator you have employed has been properly vetted and reference checked.
- Make sure you have been given permission by children and vulnerable adults and their parents/care takers to take their image and use their information.

Approved by the Board of Directors (DATE)

Attachments

- Glossary of terms
- Standards of behavior towards children and vulnerable adults
- Acknowledgment form
- Reporting form
- SRW Code of Conduct
- Complaints and Handling Policy and Procedures

Glossary of Terms

CHILD:

Any person under the age of 18. National law or local customs may use different definition; however, SRW's position is that all persons under the age of 18 should receive equal protection regardless of local age limits.

VULNERABLE ADULT:

Vulnerable adults are individuals aged 18 years and over who are at greater risk of significant harm due to factors such as gender, age, mental or physical health, or as a result of poverty, inequality or experience of displacement or crisis.

SAFEGUARDING:

The responsibility that organizations have to make sure their staff and programs promote the welfare of children and vulnerable adults and do not expose them to the risk of harm and abuse.

PROTECTION:

The responsibility and measures taken to prevent and respond to abuse and exploitation of a child or vulnerable adult. This includes building awareness, promoting training, identifying and responding to all complaints, monitoring and evaluating protection structures, and taking personal responsibility.

CHILD PROTECTION:

Child and vulnerable adult protection is about preventing and responding to violence, exploitation and abuse against children and vulnerable adults including sexual exploitation and abuse, trafficking, child labor and harmful traditional practices. It is part of the broader area of work known as Safeguarding.

ABUSE:

Any action or inaction that causes harm to another person. It can include physical abuse, emotional abuse, sexual abuse and neglect. It also includes abuse online and/or through mobile technology. There are various types of abuse including:

1. **Sexual abuse:** Any actual or threatened sexual act of violence perpetrated against a child or adult, whether by force or under unequal or coercive conditions. Examples of sexual abuse include rape, abusive sexual contact like forcing or enticing a child or vulnerable adult to take part in sexual activities that he or she does not fully understand and to which the child and vulnerable adult has little choice in consenting. This may include, but is not limited to, rape, oral sex, penetration, or non-penetrative acts such as masturbation, kissing, rubbing

and touching. It may also include involving children or vulnerable adults in looking at, or producing sexual images, watching sexual activities and encouraging children and vulnerable adults to behave in sexually inappropriate ways.

2. **Physical abuse:** Actual or potential physical harm perpetrated by another person, adult or child. It may involve hitting, shaking, poisoning, drowning and burning.
3. **Emotional abuse:** Harm done by persistent or severe emotional ill-treatment or rejection, such as degrading punishments, threats, bullying, and not giving care and affection.
4. **Neglect and negligent treatment:** Allowing for context, resources and circumstances, neglect and negligent treatment refers to a persistent failure to meet a child's or vulnerable adult's basic physical and/or psychological needs, which is likely to result in serious impairment of a child's and vulnerable adult's healthy physical, spiritual, moral and mental development. It includes the failure to properly supervise and protect children and vulnerable adults from harm and provide for nutrition, shelter and safe living/working conditions. It may also involve maternal neglect during pregnancy as a result of drug or alcohol misuse and the neglect and ill treatment of a disabled child or vulnerable adult.
5. **Emotional abuse:** persistent emotional maltreatment that impacts on a child's emotional development. Emotionally abusive acts include restriction of movement, degrading, humiliating, bullying (including cyber bullying), and threatening, scaring, discriminating, ridiculing or other non-physical forms of hostile or rejecting treatment.

EXPLOITATION:

Any actual or attempted abuse of a position of vulnerability, differential power or trust to profit monetarily, socially or politically. There are various types of exploitation including:

1. **Sexual Exploitation:** The actual or attempted abuse of a position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.
2. **Child and vulnerable adult sexual exploitation:** A form of sexual abuse that involves children and vulnerable adults being engaged in any sexual activity in exchange for money, gifts, food, accommodation, affection, status, or anything else that they or their family needs. It usually involves children and vulnerable adults being manipulated or coerced, which may involve befriending children and vulnerable adults, gaining their trust, and subjecting them to drugs and alcohol. The abusive relationship between victim and perpetrator involves an imbalance of power where the victim's options are limited. It is a form of abuse that can be misunderstood by children and adults as consensual. Child sexual exploitation manifests in different ways. It can involve an older perpetrator exercising financial, emotional or physical control over a young person. It can involve peers manipulating or forcing victims into sexual activity, sometimes within gangs and in gang-affected neighborhoods. It may also involve opportunistic or organized

networks of perpetrators who profit financially from trafficking young victims between different locations to engage in sexual activity with multiple men.

3. **Child Labor:** The term "child labor" generally refers to any economic activity performed by a person under the age of 15.
4. **Trafficking:** The recruitment, transportation, transfer, harboring or receipt of children or vulnerable adults for the purpose of exploitation such as for labor, prostitution or sexual exploitation.
5. **Survival Sex:** Occurs when a child or vulnerable adult living in poverty or in an emergency situation chooses to engage in or is coerced into sex as a last resort for survival. It is transactional sex in exchange for food, water, drugs, shelter, money and any other essential needs for integral human survival.
6. **Commercial exploitation:** exploiting a child and vulnerable adult in work or other activities for the benefit of others and to the detriment of the child's and vulnerable adult's physical or mental health, education, moral or social-emotional development. It includes, but is not limited to, child labor.

SUSPECT:

An individual, who is suspected of having abused, exploited or knowingly allowed the ill treatment of a child or vulnerable adult. Such abuse or exploitation may cause physical, sexual, emotional, psychological or other harm to an individual. Investigation would determine whether the suspect is guilty or not.

REPORTER:

An individual who identifies and reports suspected incidents of abuse or exploitation of a child or vulnerable adult. All SRW staff and Associates are required to report whenever a suspicion of abuse or exploitation involving SRW Staff or other humanitarian workers is raised, even when they may not have all the facts at hand.

Sisters Rising Worldwide Standards of Behavior towards Children and Vulnerable Adults

Sisters Rising Worldwide (SRW) and associates must remain aware of perceptions and appearances in their language, actions, and relationships to children and vulnerable adults and safeguard them from harm. Staff and associates should be aware at all times to uphold the dignity of each child and vulnerable adult and treat all with respect.

The following outline provides behavioral expectations of all Staff and Associates when interacting with children (any person under 18 years of age) and vulnerable adults. SRW staff and associates:

Must	Must Not
<ol style="list-style-type: none"> 1. Conduct themselves in manner consistent with values of SRW, including complying with the SRW Code of Conduct 2. Treat all children and vulnerable adults and their families with respect, regardless of race, color, gender, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status 3. Listen to children and vulnerable adults 4. Provide a welcoming, inclusive and safe environment for children and vulnerable adults that prevents all forms of abuse and exploitation. 5. Be sensitive when they are around children and vulnerable adults (i.e. language, conversations, touch, gestures) 6. Respect cultural differences which do not harm children and vulnerable adults 7. Be transparent in actions and whereabouts 8. Usually have at least one other adult present when they are with a child and vulnerable adult . Care and discretion must be used on all one-on-one situations 9. Ensure that an adult caretaker is present when transporting a child and vulnerable adults; and if not possible, obtain appropriate permission 10. Report any concerns of child and vulnerable adult abuse or exploitation 11. Disclose all charges or convictions if they relate to child and vulnerable adults exploitation 12. Comply with relevant country legislation 13. Ensure contact with children and vulnerable adults is supervised, accompanied or at least in sight of other adults. 	<ol style="list-style-type: none"> 1. Hit and physically abuse children and vulnerable adults (even if culturally acceptable) 2. Emotionally or verbally abuse a child or a vulnerable adult 3. Be harsh toward a child or vulnerable adult. If a child or and vulnerable adult expresses discomfort, stop the behavior 4. Have sex or engage in any sexual activity with a child or vulnerable adult including inappropriate touch 5. Send degrading or harmful written or verbal messages to a child or vulnerable adults , such as sexting, pornography 6. Use any computers, mobiles, video cameras or social media to exploit or harass children or vulnerable adult, or access, download or share child or vulnerable adult exploitation material 7. Hire a child or vulnerable adult 8. Encourage a child or vulnerable adult to meet with them outside of work-related activities 9. Take a child or and vulnerable adult to a workers' homes 10. Find themselves alone with a child or vulnerable adult (there may be exceptions) 11. Do things for child or vulnerable adult of a personal nature that they are able to do for themselves 12. Show favoritism 13. Be intoxicated or under the influence of drugs when with children and vulnerable adults

SRW Children and Vulnerable Adults Safeguarding Policy Acknowledgment Form

Acknowledgement

All SRW staff and associates must read, sign, and abide by the SRW Children and Vulnerable Adults Safeguarding Policy which prohibits abuse and exploitation of a child or vulnerable adult.

I understand SRW's commitment to protect the rights and dignity of children and vulnerable adults and to safeguard them from abuse and exploitation as defined in the SRW Children and Vulnerable Adults Safeguarding Policy.

I have read the SRW Children and Vulnerable Adults Safeguarding Policy and its attachments in their entirety and understand the following:

- The definitions of abuse and exploitation;
- That I am required to report abuse and exploitation of a child or a vulnerable adult;
- How to report, in accordance with SRW reporting procedures, maintaining confidentiality;
- That I am required to uphold the standards of behavior described in the SRW Children and Vulnerable Adults Safeguarding Policy and SRW Code of Conduct;
- That I am required to complete an orientation on the SRW Code of Conduct, SRW Children and Vulnerable Adults Safeguarding Policy, the SRW Complaints Handling Policy and Procedures and familiarize myself with related documents including:
 - o SRW Code of Conduct
 - o SRW Complaints Handling Policy and Procedure
 - o Associates' organization Complaints Handling Policy and Procedure (if applicable)
 - o Glossary of Terms
 - o Standards of behavior towards children
 - o Reporting form
- That if I have any questions, it is my responsibility to ask my supervisor or SRW Safeguarding Officer
- That breach of the Policy and failure to report may lead to disciplinary action including termination or dismissal.

Employee Signature

Date

Report Form Suspicion of Abuse or Exploitation of a Child or Vulnerable Adult

Instructions

Any suspicion or concern of abuse or exploitation of a child or an adult involving SRW staff and associates must be reported as required in the SRW Complaint and Handling Policy and Procedure and Children and Vulnerable Adults Safeguarding Policy. If you are unable to complete all of the sections, fill in what you do know. If there is more than one victim, please complete a separate report for each victim. The reporter's identity will not be disclosed except on a "need-to-know" basis. If the reporter believes danger is imminent to themselves or anyone involved, you should alert the SRW Safeguarding and Complaints and Handling Officer at once. SRW is committed to addressing and responding to all reports.

If an immediate threat to life exists or if emergency assistance is needed, please contact your local authorities and alert local senior management at once. The purpose of this Report Form is to report any suspicious activity of abuse or exploitation for SRW to assess and determine next course.

REPORTED BY:

Does the Reporter wish to be identified?

☐ Yes ☐ No

If yes, Reporter name and contact information

First Name: _____ M.I.: _____ Last Name: _____

Phone Number Include the area code or country code (Preferred): _____
(Alternative): _____

Email: _____

Name of Organization: _____ Job Title: _____

VICTIM:

Is the victim a child or an adult?

☐ Child ☐ Adult

Victim Identity:

First Name

Last Name

Nick Name

Unknown _____

(If you are unable to provide the victim's identity, check Unknown.)

Approximate age _____ Gender _____

Child refers to all persons under the age of 18

Provide any additional information _____

Caregiver/Guardian/Relative:

First Name _____ M.I. _____ Last Name _____ Unknown _____

(If you are unable to provide the caregiver/Guardian/Relative's identity, check Unknown.)

Physical Address: _____

(Examples include: name of village, street name, city, house, building)

Phone Number Include the area code or country code (Preferred) _____

(Alternative) _____

Email _____

Approximate age _____ Gender _____

INCIDENT DETAILS

Type of Incident:

(Check all that apply)

- ☐ Sexual Abuse (e.g., fondling, kissing, non-contact sexual activity, rape)
- ☐ Exploitation (e.g. sex trafficking, forced prostitution, survival sex, child labor)
- ☐ Emotional Abuse (e.g. intimidation, threats, humiliation, bullying)
- ☐ Physical Abuse (e.g. hitting, kicking, shaking)
- ☐ Other (Define other) _____

Location:

Address/Physical location of incident: _____ Country _____

(Examples include: name of village, street name, city, house, building)

Dates:

Approximate Date of Incident: Month _____ Date _____ Year _____

Date Reported: Month _____ Date _____ Year _____

Physical and Emotional State:

Physical and Emotional state of victim (Check all that apply)

☐ Cuts, bruises, welts, scratches

☐ Behavioral changes (e.g., angry, crying, acting out, withdrawn, sudden illness)

☐ Other

Please further describe the physical and emotional state of the victim

Impairment or Disability:

Does the victim have a physical impairment or disability?

☐ Yes ☐ No ☐ Do Not Know

If yes, describe the impairment or disability.

Become Aware:

How did the reporter become aware of this incident?

☐ Witnessed it ☐ Other (Define other) _____

Safety of Victim:

Was the victim in immediate danger prior to completing this form?

☐ Yes ☐ No

Were the proper authorities and senior management contacted (as appropriate)?

☐ Yes ☐ No

Please provide any additional information

**Putting our Values into Practice:
Code of Conduct
for Staff of SRW and Associates**

This Code of Conduct specifies the attitudes and behavior that all SRW staff and Associates are expected to maintain.

This Code is divided into four core areas for ease of reference.

All SRW Staff and Associates are expected to:

1. Values, Conduct and Ethics

- respect the social and moral values and teaching of the organized religions in the geographic regions of SRW projects
- ensure at all times that their personal and professional conduct is of the highest standards, and is seen to be so
- act in good faith and treat other people with dignity and respect, creating an environment that celebrates diversity
- respect all human rights and challenge discrimination, harassment, abuse, neglect, and exploitation that infringe the rights of others
- refrain from making racist, sexist or otherwise offensive statements publicly or privately
- take reasonable action to protect others from harm
- observe the laws of the country in which they are working, within the bounds of conscience
- respect and be sensitive to local customs and culture, dress accordingly
- ensure that they, and any staff that they manage, act in accordance with health, safety and security guidelines, and endeavor to safeguard others
- ensure that SRW' reputation is not be brought into disrepute
- ensure the full implementation of the SRW Children and Vulnerable Adults Safeguarding policy
- maintain the confidentiality of any information or knowledge obtained during the exercise of their duties with SRW
- perform their duties competently and with love, without prejudice or discrimination of any form, and maintain SRW' preferential option for the poor
- keep in mind local sensitivities when expressing and practicing their respective beliefs
- welcome, and build solidarity and cooperation with people from other SRW organizations

2. Conflicts of interest, coercion and corruption.

- avoid using positions of power conferred by their roles as SRW employees to exert pressure, or extract favors or personal gain economically, professionally, politically or sexually

- declare any potential or actual conflicts of interest (financial, personal or familial) in matters relating to SRW' work to their supervisor or other senior manager in writing
- refrain from accepting any favors, bribes or other forms of personal enrichment from beneficiaries, partners or contractors under any circumstances. In order to respect national and local traditions and conventional hospitality, minor token gifts can be accepted on behalf of SRW but should be declared to the CEO within 10 days.

3. Protecting SRW property and exercising stewardship

- ensure that SRW' assets and intellectual property are not misused and are protected from theft, fraud or other damage
- maintain appropriate standards of honesty and integrity in financial accountability

4. Personal conduct

- refrain from carrying any weapons on any SRW business or property (owned or rented) including accommodation/office/vehicles etc.
- refrain from using recreational drugs or consuming excessive quantities of alcohol
- ensure that their sexual conduct is appropriate at all times

Implementation of the Code of Conduct

The Chief Executive Officer is responsible for ensuring that all staff and Associates are informed of the Code of Conduct and are committed to upholding it, and that the document is reviewed and updated regularly.

Adoption or adaptation of the SRW Code of Conduct will be assessed annually.

Complaints mechanism

An external complaints procedure has been developed and is available to the public on the website. It is particularly important that beneficiaries, community members and partner staff are able to make a complaint.

Duty to report

Every member of staff and Associates have a duty to immediately report any suspicions or concerns regarding breaches of this Code. In most cases staff should raise any concerns with their supervisor. Associates raise their concerns with their designated staff person. This may be done orally or in writing and should include full details and, if possible, supporting evidence. If for some reason, (e.g. the manager may be implicated) this is not possible, they should speak to the SCHO, a more senior manager, board member or another appropriate authority.

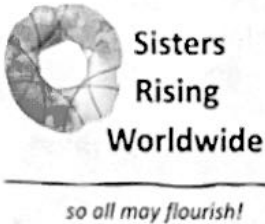
All disclosures will be treated in confidence. Anyone who raises concerns about serious malpractice will be protected from victimization or any other detrimental treatment if they come forward with serious concerns, provided concerns are raised in good faith.

Deliberate false allegations are a serious disciplinary offense and will be investigated and treated accordingly.

Breaches of the Code

Any breaches of the Code of Conduct will be investigated, and may lead to disciplinary measures.

Approved by the Board of Directors Date:



Sisters Rising Worldwide

Policy and Procedure: Complaints Handling Mechanism

Part One: Complaints Handling Policy

1.1. Introduction

Sisters Rising Worldwide (SRW) through its Vision and Mission promotes our belief and commitment to a world where every individual's rights and dignity are respected. To ensure that SRW is fully accountable to all its constituencies, staff and associates adhere to the SRW Code of Conduct.

We ensure that the people we serve and accompany, communities, partners, volunteers and staff are able to communicate any perceived shortcomings, concerns or misconduct through appropriate, safe, accessible and confidential channels. This mechanism enables SRW to fully close the accountability circle by identifying potential gaps and shortcomings in its delivery and relationship with the people it serves.

SRW is committed to strengthen its culture of responsibility that prevents these wrongdoings and abuses through works on prevention and training, and to screen better when recruiting staff and volunteers. It is also committed to redress the damage done through false accusations.

SRW, as part of an-going move to improve accountability towards all those it serves, individuals and communities, has established a Complaints Handling Mechanism (CHM) that is user-friendly, safe and accessible, but is also simple, efficient and effective and does not create undue burden. It will also develop a pastoral care of the victims. This policy is applicable to SRW staff and associates and staff seconded through SRW mandated support mechanisms. SRW does not replace individual complaints handling mechanisms that associate organizations already have in place. It provides an alternative and complementary channel for managing complaints that can be activated in redetermined circumstances and when certain conditions are met. SRW recognizes that the responsibility to handle complaints remains with associate organizations.

The aim of this policy is to:

- encourage all improper, unethical or inappropriate behavior to be identified and challenged at all levels of the organization;
- ensure anyone aware of a wrong-doing is supported in total confidence in reporting matters they suspect may involve anything improper, unethical or inappropriate;
- provide clear procedures for the reporting of such matters;

- manage all disclosures in a timely, consistent and professional manner;
- provide assurance that all disclosures will be taken seriously, treated as confidential and managed without fear of retaliation.

1.2.Scope and limitation of the policy

A complaint is an expression and a statement that something is unsatisfactory or unacceptable vis-a-vis the prescribed standard of quality work or is related to the actions taken or lack of action by staff or associates that directly or indirectly cause distress to the affected party.

What complaints can be made:

Allegations of breaches in SRW Code of Conduct and Children and Vulnerable Adults Safeguarding Policy in relation to financial impropriety, corruption, fraud, sexual exploitation and abuse, and not ensuring child safeguarding.

Anonymous complaints:

We recognize that it can be difficult in some circumstances to speak out openly. Therefore, SRW will accept and handle anonymous complaints with caution if there is sufficient information to clarify the issues, substantiate claims and investigate allegations properly.

Malicious complaints:

When the investigation finds that an accusation was deliberately made falsely and with the aim of causing harm, and if the complainant is a staff of SRW, appropriate disciplinary action will be taken including dismissal. Reporting which proves to have been made maliciously will be viewed as a serious disciplinary offense. If the identity of the person against whom the malicious accusation was made publicly known, SRW will take due care to rehabilitate and restore their reputation.

Complaints against member of the clergy or religious congregations:

Complaints made against staff and associates that are members of the clergy or religious congregations are dealt with in coordination with the religious order of belonging or the designated religious authority.

What complaints will not be processed:

Complaints related to associate organizations' staff grievance, performance issues, employment and labor matters, hostile work environment, harassment on the workplace are dealt exclusively by associate organizations through their appropriate country legislation and HR policies and procedures

1.3. Who can make a complaint under this policy

1. Anyone who is impacted by activities carried out by SRW and its Associates.

Complaints received by SRW against an association organization will be referred back to the associate organization for follow-up and action.

2. SRW staff and associates
3. Donors, public

1.4. Reporting obligation

Any staff or associate who has knowledge or suspicion of a potential breach of the SRW Code of Conduct or the Children and Vulnerable Adults Safeguarding Policy has an obligation to report the concerns. Not complying with this rule leads to disciplinary action.

1.5. Key areas and types of complaints

Key areas of possible complaint may include, but are not limited to:

1. Behavior or conduct of SRW staff and associates
2. Financial improprieties such as misuse of funds, fraud or corruption
3. Harassment, including sexual exploitation and abuse
4. Emotional abuse such as intimidation, humiliation, bullying and mobbing

1.6. Confidentiality

All complaints, whether sensitive or non-sensitive will be handled in a confidential manner. In some cases, it may be necessary to disclose information to third parties. This will be decided on a case-by case basis and, as far as possible, with the agreement of the complainant. These two types of complaints need to be handled in different ways taking into consideration specific requirements and any risks to parties involved.

Confidentiality is paramount to guarantee safety to complainants, whistleblower, witnesses and subjects of complaints. Information with regards to complaints and related investigations should only be shared on a need-to-know basis, clearly identified for each case. In case of breach of confidentiality, SRW may take disciplinary action, except when:

- Disclosure is required by law
- Disclosure is required by management in the best interest of all parties involved
- Disclosure is needed in order to obtain specific expertise (medical, legal, other)

Complaints that indicate a possible criminal offense has been committed should be referred by SRW to the authorities responsible for investigating such matters.

1.7. Working with Associates

SRW recognizes that the primary responsibility to handle complaints against associates is with associates. SRW will strategically and consistently encourage Associates to develop their own complaints handling mechanism by:

- Providing support to associates for setting up contextualized CHM and raising awareness on expected behavior and channels for complaining

- Providing support to member organizations for capacity building with regards to investigations
- Encouraging associates with stronger CHM and PSEA (Prevention of Sexual Exploitation and Abuse) experience to act as champions towards other associates through a coordinated and harmonized system of support

Part Two: Complaints Handling Procedure

2.1. Receiving a complaint

Formal complaints should be made in writing or via e-mail to SRW Safeguarding and Complaints Handling Officer (SCHO). If an informal complaint is received by telephone or in person, but cannot be dealt with at the time of the conversation, the complainant must be made aware of the SRW CHM including the possibility of making an anonymous complaint. The complainant decides whether to formally submit a complaint or not.

Complaints submitted to SRW main email will be forwarded to the SCHO. The complainant will receive notice of receipt within one week.

2.2. Recording the complaint

Complaints will be recorded onto an internal SRW system. It will have restricted staff access, and will support complaints being logged on receipt, actions tracked and outcomes recorded.

2.3. Processing the complaint

It is the responsibility of the SCHO to preliminarily assess the type and nature of the complaint and recommend the most appropriate course of action to be undertaken. This will be reviewed and approved by the Safeguarding and Complaints Handling Committee (CHC). As a general rule sensitive complaint will be dealt with in the following manner:

1. Complaints against SRW staff and associates will be dealt with by the SCHO directly.
2. Complaints against Associates will trigger the mandated support mechanisms that will be coordinated as appropriate by the SCHO. The Associate organization has the primary responsibility to appropriately investigate the complaint while SRW SCHO retains the right to oversee the investigation.
3. Complaints that involve SRW Associates that do not have the capacity to process the complaint will be assessed on a case-by case basis. If necessary and when requested by the concerned associate organization, SRW SCHO will work together with the associate organization in carrying-out the investigation while simultaneously strengthening their internal procedures and capacities to deal with complaints.

4. If an associate organization is unwilling to act upon the complaint, SRW will promptly inform the relevant legal authorities and suspend financial transfers until an investigation is complete.
5. Associate organizations will within thirty days report to SRW SCHO on determination of the breaches and action plan, investigation plan and, if needed, request the SCHO support.

2.4. Sensitive complaints

Sensitive complaints will be immediately referred to the SRW SCHO. The SRW SCHO will make the first screening and assessment of the complaint and agree the most appropriate course of action. Complaints contemplating allegations of sexual exploitation and abuse will be shared by the SCHO only with the SRW President, those relating to financial improprieties will also be shared with the SRW Financial Manager and the Treasurer. The seriousness of the complaint will determine how the investigation should be conducted. Details will be shared on a strictly need to know basis.

Sensitive complaints that contemplate a gross violation of the SRW Code of Conduct or Children and Vulnerable Adults Safeguarding Policy and that refer to Associate organization staff or associates will be communicated by the SRW SCHO to his/her equivalent in the Associate organizations. These complaints follow the strict rule of confidentiality and need-to-know basis. The SCHO will provide the CHC only the essentials of the complaint i.e. the nature of the complaint, the course of action decided and, when ready, the outcome of the procedure. No details will be shared with the CHC regarding the names of the complainant, accused, victim, witnesses or whistle blowers.

2.5. Investigation process

The SCHO will have the primary responsibility to coordinate the investigation. Investigations will be carried out confidentially and only persons that need to know about the complaint will be involved in the process. Complex sensitive complaints will be investigated by external qualified experts from a preselected and verified pool of investigators. The SCHO will identify the most qualified expert investigator based on the nature of the complaint, geographic location and language requirements. Timeframes for completing the investigation vary depending on their complexity. The aim is to conclude it within the shortest reasonable time ideally not exceeding sixty days from receiving the complaint. The final report will be shared with the SCHC for review and approval.

The decision on the type of action to be undertaken at the completion of the investigation process will be taken by the CEO, or if s/he is the one accused, by the President of SRW.

Costs associated with investigations initiated as a result of complaints against SRW staff and associates will be covered by SRW. Costs associated with investigations initiated as a result of complaints against those deployed through SRW mandated support mechanisms will be covered by the associate organization(s). Should this not be possible, alternative funding sources will be explored.

2.6. Communicating outcomes

The SCHO will provide feedback to the complainant and those involved in the complaint as appropriate.

In case of a sensitive complaint, the complainant, unless s/he is at the same time the victim, has no "right" to know the outcome of the investigation. The SCHO will provide the complainant with the information whether the complaint has been substantiated or that the complaint is not substantiated. No other information or detail will be disclosed.

2.7. Appeals procedure

SRW wishes that any complaint be resolved in a satisfactory fashion for both the complainant and the organization. If the complainant does not feel satisfied with the outcome s/he can appeal to the SRW President through the SCHO. This can be done in writing, by letter or email, to the following address:

SRW
1884 Randolph Avenue
Saint Paul, Minnesota, USA 55105

irene@sistersrisingworldwide.org

Approved by the Board of Directors

2-19-2019
4/9/2024