

OFFICIAL



FSD AFRICA

SAFEGUARDING POLICY

MAY 2022



Title	Safeguarding Policy	
Policy Owner	Director of Human Resources	
Board	Tokunboh Ishmael	
Review date	After three years	
Background	<p>There has been a significant increase in the efforts made by development organisations to ensure that no harm results from the contact their employees, volunteers and other representatives have, either directly or indirectly, with their target populations or communities. Considerable efforts have also been made to ensure no harm results to their employees and volunteers from within their organisation.</p> <p>Accordingly, FSD Africa has put in place various guidelines and procedures to safeguard employees, volunteers and associated persons from harm. At a Board meeting in March 2020, the Board recommended that a Safeguarding Policy be created to complement the underlying procedures.</p> <p>At FSD Africa, our steadfast commitment to the highest ethical and business standards, as set forth in our Safeguarding Policy, underpins everything we do. Whether we're collaborating with our partners or interacting with our co-workers, we understand that behaving ethically is the cornerstone of our reputation, making it possible for us to reduce poverty by strengthening Africa's financial markets.</p>	
Policy Reviewers	Director HR and Talent Management	Yes
	EXCO	Yes
	Legal	Yes
	Staff Consultative Committee Representative	Yes
Policy Approvers	Director HR and Talent Management	 Yes <div data-bbox="1236 1482 1362 1532" style="border: 1px solid black; padding: 2px; font-size: 8px;"> FINANCIAL SECTOR DEEPENING AFRICA LIMITED P.O. Box 8080 - 00100 NAIROBI </div>
	CEO	Yes
	NRC Chair	Yes
Executive summary	<p>This policy communicates FSD Africa stance of zero tolerance to safeguarding and in particular sexual exploitation, abuse and harassment. The policy defines what safeguarding means and provides guidance to those involved in managing safeguarding concerns.</p> <p>The policy outlines FSD Africa's expectations of its staff, partner, directors and partners with regards to safeguarding. It assigns roles and responsibilities in managing safeguarding risks in FSD Africa.</p>	



	<p>The policy is intended to help FSD Africa to have a common understanding of safeguarding issues, develop good practice across the diverse and complex areas in which they operate and thereby increase accountability in this crucial aspect of work.</p> <p>The standards of behaviour outlined in the Safeguarding Policy make perfectly clear our expectation that FSD Africa staff and personnel practice our most important values. Complying with the Safeguarding Policy is a condition of employment at FSD Africa; therefore, staff members are required to acknowledge annually that they understand and comply with it.</p>
What has changed?	Updated the names of the current Safeguarding Officers



SAFEGUARDING POLICY

Date of review: After 3 years (May 2025)
Policy owner: Director of HR and Talent Management
Confidentiality: Public

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1. Introduction

Safeguarding is the responsibility that an organisation has to ensure that their employees and volunteers, partners, vendors, operations and programmes do no harm to children, young people or vulnerable adults nor expose them to abuse or exploitation.

This means not exposing them to the risk of discrimination, neglect, harm and abuse; and that any concerns the organisation has about the safety of children or vulnerable adults within the communities in which they work, are dealt with and reported to the appropriate authorities.

Safeguarding is also the responsibility that an organisation has for protecting its employees and volunteers when they are vulnerable, for example, when ill or at risk of harm, abuse or inappropriate behaviour such as bullying and harassment.

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

FSD Africa endorses the United Nations Convention on the Rights of the Child (UNCRC) and agrees that all the rights guaranteed by it must be available to all children without discrimination with particular reference to article 19 which accords equal rights to protection for children from abuse.

For the purposes of this policy and associated procedures, the term “child” or “children” refers to a person or persons under the age of 18 years.

2. Policy statement

Statement

FSD Africa and its subsidiary FSD Africa Investments (together, “FSD Africa”) have zero-tolerance for abuse, harassment and exploitation of children, vulnerable adults and employees; and will not tolerate actions or practices that undermine the safety of staff, volunteers, partners, grantees or end-user beneficiaries. FSD Africa will put in place reasonable measures to ensure the safety and well-being of its employees, volunteers and the vulnerable people with whom its work brings it into contact. This includes and is not limited to systems, policies and procedures to prevent, report and respond to concerns raised adequately.

FSD Africa recognises that safeguarding is everyone’s responsibility and that it has a social, moral and legal responsibility to protect and safeguard the welfare of children, young people and adults in vulnerable situations with whom its work brings it into contact. It will, therefore, ensure that the provisions of this policy are cascaded to those associated with the delivery of its work.

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

Key principles

In line with the above statement, FSD Africa fully supports and will embed the following key principles in relation to safeguarding.



- a) Everyone has an equal right to protection from abuse and exploitation regardless of age, race, sex, sexual orientation, marriage and civil partnership, pregnancy or having a child, gender reassignment, language, religion, political or other opinions, national, ethnic or social origin, property, disability, birth or other status.
- b) The best interests of the child, vulnerable adult or victim must be paramount and shall be the primary consideration in all decision making.

3. Commitments

- a) FSD Africa will meet its obligations regarding its duty of care towards children, vulnerable adults and employees and take action where it believes that a child or vulnerable adult in contact with FSD Africa's work, or employee is at risk or is harmed.
- b) FSD Africa takes all concerns, suspicions and allegations of abuse or harm seriously and will respond to them promptly, fairly and consistently.
- c) FSD Africa will put in place appropriate measures including specific policies and procedures, induction and training, safer recruitment, accountable and transparent systems of response, reporting and learning when risks materialise; to ensure, as far as possible, the safety and wellbeing of their employees. Taken together, these measures will ensure that FSD Africa's organisational culture continues to emphasise that safeguarding is of paramount importance.
- d) FSD Africa will ensure that when working with or through partners or subcontracted agencies, their safeguarding procedures are consistent and in line with the principles and approaches set out in this policy. Partners will be informed about and expected to comply with this policy and any breach by partners of this will result in suspension or termination of their relationship with FSD Africa, at FSD Africa's sole discretion.
- e) The Safeguarding Officer will keep all information anonymous or confidential to the extent practicable. Matters reported to the Safeguarding Officer are taken very seriously and are reviewed promptly and fairly.

4. Purpose of this policy

The purpose of this policy is to provide guidance to those involved in managing organisational safeguarding concerns.

This policy and its associated procedures set out how FSD Africa will deal with safeguarding issues which give cause for concern and the type of actions that FSD Africa will take to manage issues and provide support.

It is intended to ensure all FSD Africa employees and partners have a common understanding of safeguarding issues, develop good practice across the diverse and complex areas in which FSD Africa operates and ensure accountability in this crucial aspect of work.

The document also provides assurance that FSD Africa will take any reported concerns seriously and will ensure that its staff are kept safe.

5. Scope of the policy

This policy applies to all staff directly or indirectly employed by FSD Africa ("FSD Africa Staff Members") and associated personnel whilst engaged with work related to FSD Africa, including but not limited to



the following: partners, grantees, consultants, volunteers and contractors (together, “FSD Africa Personnel”).

All such FSD Africa Personnel are required to acknowledge that they are aware of, have understood, and will comply with the contents of this policy. Such acknowledgment will be provided through their contractual arrangements¹ with FSD Africa which cross-refer to this policy.

6. FSD Africa Designated Safeguarding Officers

FSD Africa has a designated Board-level **Safeguarding Director** who is responsible and accountable for issues reported across the organisation.

FSD Africa also has a designated **Safeguarding Officer** and a **Safeguarding Officer Alternate**, to whom any safeguarding issues can be referred. The Safeguarding Officer is tasked with keeping track of, and addressing appropriately, any issues brought to her or his attention, escalating issues for resolution where necessary.

The **Director HR and Talent Management** is responsible and accountable for safeguarding standards including defining the safeguarding policies and procedures that must be in place.

In addition to the Designated Safeguarding Officers:

- The **Chief Executive Officer** of FSD Africa is ultimately responsible for ensuring the effective implementation of this policy.
- FSD Africa’s **Staff Consultative Committee** has an informal role in receiving safeguarding issues and escalating these as needed.

7. Reporting a safeguarding concern

If FSD Africa Staff Members receive an allegation, report or concern or have a suspicion that someone is suffering or is likely to suffer significant harm, no matter what the cause, they should seek the advice and assistance of the designated Safeguarding Officer setting out the basis of the suspicion as clearly as possible. This should be done immediately without awaiting confirmation of concerns.

A dedicated email address exists for this purpose – safeguarding@fsdafrica.org. This email address routes messages to both the Safeguarding Officer and to the Director HR and Talent Management.

FSD Africa Staff Members who are unsure of whether or not to pass on a concern to the Safeguarding Officer may wish to talk first to their manager. The decision as to whether to pass on the concern to the Safeguarding Officer or their line manager, however, is the responsibility of the staff member who has received an allegation, concern or report of a safeguarding issue.

If FSD Africa Personnel who are not FSD Africa Staff Members, or any other external parties, receive an allegation, report or concern or have a suspicion that someone is suffering or is likely to suffer significant harm, no matter what the cause, they should seek the advice and assistance of their main contact at FSD Africa, setting out the basis of the suspicion as clearly as possible. This should be done immediately without awaiting confirmation of concerns.

However, if their main contact is implicated in the safeguarding matter, they should refer the matter instead to the Chief Executive Officer of FSD Africa. Again, this should be done immediately without awaiting confirmation of concerns.

¹ employment contract, grant agreement, service contract etc. (as the case may be)



They may also wish to refer the matter to the Safeguarding Officer by sending an email to safeguarding@fsdafrica.org.

FSD Africa Personnel who are not comfortable with raising concerns to the Safeguarding Officer are encouraged to use the whistleblowing hotline which provides anonymity. The details of the hotline available 24 hours a day and 7 days a week:

Calling the following free hotline:

0800 722 626 (available in Swahili and English)

Emailing: FSDAfrica@tip-offs.com

FSD Africa Personnel may also report safeguarding or other concerns to:

reportingconcerns@dfid.gov.uk

8. Handling a safeguarding concern

FSD Africa Staff Members who receive a safeguarding concern, whether emanating from FSD Africa Personnel or an external party, must immediately and without attempting to investigate concerns or allegations themselves report it through appropriate channels to the Safeguarding Officer.

All safeguarding concerns raised will be listened to sensitively and in a confidential manner.

The Safeguarding Officer should immediately notify the Director HR and Talent Management and/or the Chief Executive Officer unless either of those individuals is implicated in the claims being made in which case the matter should be escalated directly to the Safeguarding Director.

“Immediately” means without any delay and, at the latest, by close of business on the same day.

The Director HR and Talent Management and/or the Chief Executive Officer, having received notification of a safeguarding allegation, should move quickly to establish the basic facts of the allegation, including whether or not the allegation is likely to be true, before promptly escalating the matter to the Chairman of the Board of FSD Africa, the Safeguarding Director and DFID.

“Promptly” means a few days at the most, although it is expected this would be 48 hours maximum.

It is the remit of external authorities rather than anyone connected with FSD Africa to investigate safeguarding concerns where it is suspected that a crime has been committed. FSD Africa is not an investigating authority for safeguarding issues where a crime is suspected. Members of FSD Africa Personnel should not make referrals to external authorities other than in consultation with the Safeguarding Officer and after taking into account the wishes of the adult survivor.

Such referrals must be made to the relevant law enforcement agency to ensure that appropriate protection and support is given to the vulnerable individual and that any evidence is collected in accordance with the law.

9. Investigations

Investigations are an integral part of maintaining an ethical culture. All alleged violations of the Safeguarding Policy will be investigated. The scope and nature of those investigations will be determined by FSD Africa’s Chief Executive Officer, working with the Designated Safeguarding Officers, and will vary depending on the specific details of the alleged violation.



When FSD Africa becomes aware of an alleged violation of the Safeguarding Policy, the matter will be escalated immediately to the Director of HR and Chief Executive Officer. They will then develop an investigation plan that may require assembling a cross-functional investigative team with subject-matter expertise. Although the Director of HR and Chief Executive Officer will lead safeguarding-related investigations, they may—at their discretion—direct a subject matter expert in a different pillar/ business function to conduct all or part of an investigation in certain circumstances, although will retain oversight of the matter nonetheless.

What you can expect from FSD Africa:

- FSD Africa will handle all investigations in an appropriate, confidential, and expeditious manner to ensure that individuals are treated fairly and with respect.
- FSD Africa has zero tolerance for retaliation. Retaliation is not allowed against any staff or personnel for reporting a suspected violation or for participation in a safeguarding violation investigation. Staff and personnel, regardless of seniority or status, who take part in retaliatory activities will be subject to disciplinary action and could lose their jobs
- A safeguarding allegation, if upheld, will almost always result in a staff member being dismissed on grounds of gross misconduct.

What FSD Africa expects from you:

- Cooperate fully with the investigation when requested and answer questions truthfully and to the best of your ability.
- Respect the confidentiality of the investigation process.
- Do not submit false accusations. Just as retaliatory behaviour is not permitted, knowingly submitting a false report will subject you to disciplinary action.
- If asked to participate in an investigation, keep the investigation confidential. Do not spread information or participate in or perpetuate rumours related to any aspect of the matter.
- Do not carry out your own investigation. Report all suspected violations to FSD Africa's Safeguarding Officer or Director of HR and Talent Management.

10. Survivor support

FSD Africa will provide appropriate support to the survivor(s) of safeguarding incidents. This will be provided as a duty of care even if a safeguarding matter has not yet been investigated. Support will be provided on a case by case basis as needed and would entail aspects such as access to counselling services.

11. Malicious reporting

FSD Africa Personnel are encouraged to make reports in good faith. Reports made in good faith, even though unsubstantiated or unproven following an investigation will not be considered malicious and FSD Africa Personnel will not be penalised for having made them.

However, FSD Staff Members who deliberately make malicious reports to the detriment of another will be subject to disciplinary measures.

12. Safer recruitment

FSD Africa will ensure safe recruitment and vetting processes are followed for all employees, consultants and partners as recorded in the FSD Africa's Recruitment and Talent Attraction policy and



procedures. This includes but is not limited to background checks and reference checks from previous employers.

Where FSD Africa Personnel are engaged to work directly with vulnerable individuals, a criminal background check will be undertaken as part of the recruitment process. Candidates will also be asked specific safeguarding questions during the interview.

All FSD Africa Personnel must comply with this Safeguarding Policy and the FSD Africa Code of Conduct. The Code sets out the standards of practice we expect in terms of professional competence, integrity, acting as a representative and in safeguarding - which supports our vision, mission and values.

13. Induction and training

All FSD Africa Staff Members will receive an induction into safeguarding no later than three months after joining FSD Africa. Staff will also be expected to take mandatory safeguarding training and refresher courses annually. Partners and consultants will be expected to demonstrate that their staff undertake safeguarding training on a regular basis (at least annually).

The Safeguarding Director will provide input into the development of FSD Africa's approach to training and will provide assurance to the Board of FSD Africa that what is being done by way of safeguarding training is adequate.

14. Media and the use of images

All photos taken should respect human dignity and consider the rights, safety and well-being of the person or people being portrayed. In relation to safeguarding, FSD Africa Personnel must not:

- Reproduce images and use names of young people and vulnerable adults unless they have clear written permission of their parents or guardians whichever is suitable
- Take pictures that expose children and vulnerable adults to further vulnerability e.g. degrading pictures or pictures that show naked children or partly clothed children
- Not using technology to access, produce or distribute any information or violent sexual images that are harmful to vulnerable people.

15. Responsibilities

14.1 Everyone

All FSD Africa Personnel have responsibility:

- a) To promote a zero-tolerance approach to discrimination, sexual harassment, exploitation and abuse in all forms and place the safety and welfare of children and vulnerable people above all other considerations.
- b) To report any safeguarding concerns they may have that relates to FSD Africa Personnel.
- c) To ensure that they do not take any actions that could compromise FSD Africa's values nor engage in relationships with FSD Africa Personnel, prospective or actual beneficiaries or grantees that could be deemed exploitative.

In addition, FSD Africa Personnel must not practice the following prohibited behaviour:



- a) Sexually, emotionally or physically harass, exploit, or abuse another person.
- b) Engage in sexual activity or relationships with anyone under the age of 18 or put a child, young person or vulnerable adult at risk of harm.
- c) Exchange money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour.
- d) Use their position of power to take advantage of a fellow staff member, grantee (or prospective grantee), partner (or prospective partner), beneficiary or volunteer for sexual purposes.
- e) Develop, encourage or fail to take action of relationships with children or other vulnerable people which could in any way be deemed sexual, exploitative or abusive.

14.2 Staff

All FSD Africa Staff Members have a responsibility:

- a) To read, understand and adhere to this Safeguarding Policy and the FSD Africa Code of Conduct.
- b) To attend a safeguarding induction and/or training as availed by FSD Africa.

To begin working at FSD Africa and to continue working at FSD Africa, every staff member must read and acknowledge annually that he or she will comply with FSD Africa's Safeguarding Policy. This annual acknowledgment ensures that all employees carry out their work in compliance with our shared values. Staff members have two ways (online or paper form) to sign a Safeguarding Policy Acknowledgment Form. This can be done either online or in hard copy.

Your manager will be able to show you where to find the Safeguarding Policy Acknowledgment Form.

Managers

Managers at all levels within FSD Africa are responsible for:

- a) Ensuring employees, volunteers, consultants, visitors and partner organizations are inducted into this policy and are supported to implement and work in accordance with it.
- b) Ensuring partners (and prospective partners) are aware of the channels available to them for raising concerns and are encouraged to use them.
- c) Ensuring that a safeguarding risk assessment has been undertaken as part of programme delivery.
- d) Creating a management culture that encourages a focus on safeguarding.
- e) Ensuring that they are responsive, acting immediately if they become aware of any safeguarding concerns and supportive towards FSD Africa Personnel who raise concerns about a safeguarding matter.

14.3 Chief Executive Officer

The FSD Africa Chief Executive Officer is responsible for ensuring the effective implementation of this policy and associated procedures and ensuring that everyone associated with FSD Africa is equipped and supported to meet their responsibilities.



14.4 Board members

The FSD Africa Board holds ultimate accountability for this policy. The Board of Directors plays an important role in safeguarding, not least in terms of setting the right tone for the organization and creating a culture and environment where people feel comfortable about raising safeguarding concerns.

FSD Africa Directors will also:

- a) Ensure that there are adequate systems in place to manage safeguarding risks. This includes policies and procedures, prevention, reporting and responding mechanisms.
- b) Ensure that there is a Board-level representative of safeguarding concerns.
- c) Ensure that FSD Africa emphasizes victim support.
- d) Ensure that FSD Africa achieves transparency and accountability concerning safeguarding while taking account of the sensitivities of the subject matter and the rights and welfare of those affected.

14.5 Designated Safeguarding Officers

The Designated Safeguarding Officers will:

- a) Record all incidents relating to safeguarding concerns and will report them to the FSD Africa Board on an annual basis (in an anonymised form). This report will be confidential and if any concerns or patterns of abuse emerge these will be dealt with appropriately.
- b) Conduct or facilitate safeguarding training and induction for FSD Africa Personnel.
- c) Provide support, advice and assistance to any member of FSD Africa Personnel who feels they may have been the victim of conduct of a sexual nature that has made that person feel offended, humiliated and/or intimidated.
- d) Where appropriate, support internal reviews and investigations into safeguarding concerns.

16. Safeguarding and associated persons e.g. partners

Associated persons including all partners, consultants and contractors of FSD Africa are expected to abide by this policy. They have a duty to:

- a) Prevent sexual exploitation, abuse, harassment or bullying, by or of their personnel, FSD Africa staff members or consultants, or beneficiaries whom the funds are intended to benefit.
- b) Ensure that their personnel and contractors related to them understand and abide by the contents of this policy.
- c) Notify FSD Africa immediately of any actual incident of sexual harassment or bullying, or any allegation thereof, and advise FSD Africa of how it intends to deal with the matter.
- d) To act without delay to bring serious allegations of sexual harassment to the attention of relevant national authorities and to cooperate promptly and fully with any enquiry that national authorities may pursue.



- e) Disclose to FSD Africa whether personnel are or has been the subject of disciplinary proceedings in relation to sexual harassment or bullying or an allegation of the same, nor questioned by national authorities nor convicted in relation to sexual crimes

A report made by an associated person or partner to FSD Africa may not necessarily result in the ending of the relationship with FSD Africa. However, breach of the policy and deliberate non-disclosure of safeguarding concerns will present grounds for the immediate suspension or termination of the contract, at FSD Africa's sole discretion.

17. Independent assurance

All operations of FSD Africa are subjected to an independent external audit. FSD Africa commits to having an annual independent assurance of its safeguarding practice.

18. External reporting and legal compliance

FSD Africa is subject to laws and regulations of the countries it operates in and is committed to fully comply with them.

It is recognised that this policy identifies minimum standards that may exceed the requirements of local legislation, and these standards must be upheld where they do not cause conflict with local law.

External reporting to regulators or other bodies will be made in line with laws and regulations and any agreements signed by FSD Africa.

The Safeguarding Director must ensure reports to external stakeholders are made in line with the relevant laws, regulations and agreements signed by FSD Africa.

The Director HR and Talent Management will retain a record of all incidents reported and managed and use that information for decision making as appropriate.

19. Data protection

FSD Africa respects confidentiality and has a responsibility to protect sensitive personal data. Information will only be shared on a *need to know* basis, that means, access to the information must be necessary for the conduct of one's official duties. Only individuals who have legitimate reasons to access the information are allowed to receive it. Express written consent will be obtained from an individual or in case of a child, parent/guardian as required. See Data Protection Policy.

20. Review of this policy

The Director HR and Talent Management is responsible for overseeing and updating this policy and associated procedure taking into consideration any legal obligations and other external requirements. In the event of no external changes, this policy will be reviewed initially after one year of operation and thereafter every two years.

21. Related policies

This policy should be read in conjunction with:

1. Data protection policy (Section 3 and 4)
2. Code of Conduct (section 4.1.5)
3. Recruitment and talent attraction policy and procedures (Section 5.8)
4. IT policy and procedures (Section 5 and 6)



5. Anti-corruption and integrity policy and procedures (section 2)
6. Whistleblowing policy
7. Disciplinary policy and procedures
8. Terms of reference for Designated Safeguarding Officers



Addendum 1: Key definitions²

The following are key definitions relevant to this policy.

Abuse is a violation of an individual's human and civil rights by any other person or persons. It can take the form of physical, psychological, financial or sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the health, survival, development or dignity of a child, young person or vulnerable adult. Abuse can be a single act or repeated acts and can be unintentional or deliberate. Abuse often involves criminal acts.

Abuse of power covers a wide range of behaviour related to the dynamics of power (in the workplace, community or home). It refers to using a position of power to take unfair advantage of a fellow staff member, community member, partner or volunteer. An example includes a male senior member of staff using his position to get sexual favours.

Sexual abuse is a broad term which includes a number of acts such as forcing, enticing or coercing someone to take part in sexual activities, whether or not the person is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

It also includes indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

They may also involve a vulnerable person in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

All sexual activity with children (as defined under the UN Convention on the Rights of the Child as any person under the age of 18) is sexual abuse, regardless of the age of maturity or consent locally. Mistaken understanding of the age of a child is not a defence.

Sexual exploitation constitutes any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including profiting monetarily, socially or politically from the sexual exploitation of another. It is a broad term, but it includes transactional sex, solicitation of transactional sex and exploitative relationships.

Sexual harassment is any form of unwanted verbal, non-verbal or physical conduct of a sexual nature with the purpose or effect of violating the dignity of a person, in particular when creating an intimidating, hostile, degrading, humiliating or offensive environment.

It involves any unwelcome sexual advance; request for sexual favours; verbal or physical conduct or gestures of a sexual nature; or any other behaviour of a sexual nature that might reasonably be expected, or be perceived, to cause offence or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment. Sexual harassment can be perpetrated against beneficiaries, community members, citizens, as well as staff, personnel, etc.

² Definitions used in this policy have been obtained from various sources including the UN, Bond UK, Keeping Children Safe and DFID guidance.



Victim or Survivor

The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive. However, it is the individual's choice how they wish to identify themselves.

Psychological abuse - includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

Discriminatory abuse – abuse motivated by a person's age, race, nationality, sex, sexual orientation, disability, or other personal characteristic.

Neglect is the persistent failure to meet a vulnerable person's basic physical and/or psychological needs, likely to result in the serious impairment of his/her health or development.

Physical abuse includes hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm, misuse of medication, restraint, or inappropriate sanctions.

Child – (anyone under the age of 18 years, irrespective of the age of majority in the country in which the child lives or in their home country). It is widely recognised that children are generally more vulnerable to abuse and exploitation due to factors such as age, gender, social and economic status, developmental stage, and dependence on others.

Vulnerable adult - a person, 18 years and above, who by reason of disability, age, gender, social and economic status, or illness, the context they are in, may be unable to take care of or to protect him or herself against abuse, harm or exploitation.

Youth or young people - individuals aged 15 to 25 (15 to 35 in some countries) –recognises that this group spans the categories of 'children and 'adults' but regards young people as having particular safeguarding needs and requiring distinct consideration aside from younger children and older adults.



Addendum 2: Designated Safeguarding Officers

FSD Africa has designated **Tokunboh Ishmael** as the **Safeguarding Director** who is responsible and accountable for issues reported across FSD Africa’s operations.

FSD Africa also has a designated **Safeguarding Officer (Mary Njuguna)** and a Safeguarding Officer, Alternate (**Beatrice Mubia**) to whom any safeguarding issues can be escalated.

FSD Africa’s Director of HR and Talent Management is **Hellen M. Kong’ong’o**

safeguarding@fsd africa.org will route messages to the Safeguarding Officer and to the Director HR and Talent Management.

The Designated Safeguarding Officers will fulfil tasks as outlined in section 6 and section 14 of the policy.