

Safeguarding Policy



**Madhya Pradesh Samaj Seva
Sanstha**

Table of Contents

Madhya Pradesh Samaj Seva Sanstha (MPSSS) - Safeguarding Policy and Procedures	4
Section I: What is safeguarding?	4
1.1 Introduction	4
Safeguarding Role of MPSSS	5
Purpose of the Safeguarding policy	6
• Awareness to build safeguarding capabilities:	6
• Learning to report abuse to evolve behaviors:	6
• Monitoring the compliance to revive commitment to safeguard	6
Implications for the Partners	6
1.2 Scope and limitation.....	6
1.3 Policy authority and designate	7
1.4 Safeguarding Policy Principles	7
1.5 Legal backdrop	7
1.6 Definitions	8
Section II: MPSSS Safeguarding Policy	13
1. Policy statements	13
1.1 At the community level	13
1.2 At the level of MPSSS Team	13
2. Putting Policy into Practice.....	13
2.1 Capacity for Safeguarding	13
2.2 Demonstrate commitment.....	14
2.3 Support extended through an enabling process	14
2.4 Breaches, Reporting, Disciplinary process.....	14
Section III. Safeguarding Procedures – Its practice in every day work	15
1. Safe Recruitment.....	15
2. Reference check before being designated as a MPSSS Team	15
3. Supervision practice induction to exit.....	15
4. Increasing awareness for building safeguarding capacity	16
5. Safeguarding Children	16
6. Safeguarding Vulnerable Adults	17
7. Safeguarding Programs / Themes /Project cycle	18
8. Safeguarding safety and security	20
9. Procedure to reporting a safe guarding complaint and the role of the Whistle blower	23
Working with partner organizations	25
10. What will MPSSS do to strengthen safe guard practice?	25

Complaint Handling Procedure	26
Partners Complaint Reporting.....	27
Sensitive complaints.....	28
Investigation process	28
Communicating outcomes	29
Appeals procedure	29
Annex 1 - MPSSS Safeguarding the communication about children and vulnerable adults.....	30
Annex 2 -MPSSS Team Safeguarding Code of Conduct.....	31
Annex 3 – The safeguarding mechanism.....	33
Annex4 –Safeguarding Concern Report Form.....	36

ACRONYMS

CBCI	Catholic Bishops Churches of India
CHM	Complaint Handling Mechanism
CBO	Community Based Organization
CP	Child Protection
DR	Director Administration
DRR	Disaster Relief and Rehabilitation
DPO	Disabled Peoples Organization
ED	Executive Director
ER	Emergency Relief
FRA	Forest Right Act
HR	Human Resource
NGO	Non-Government Organization
PESA	Panchayat (Extension to Scheduled Areas) Act 1996
POSCO	Protection of Children from Sexual Offences Act 2012
POSH	Prevention of Sexual Harassment Act 2013
PwD	Persons with Disabilities
M&E	Monitoring and Evaluation
MPSSS	Madhya Pradesh Samaj Seva Sanstha
SCST (PA)	Scheduled Castes and Scheduled Tribes (Prevention of Atrocities) Act 1989
RPWD	Rights of Persons with Disabilities
SPP	Safeguarding Policy and Practice
SAFP	Sathi All For Partnerships
SOP	Standard operating Procedures

Madhya Pradesh Samaj Seva Sanstha (MPSSS) - Safeguarding Policy and Procedures

Section I: What is safeguarding?

1.1 Introduction

Madhya Pradesh Samaj Seva Sanstha (MPSSS) expects the highest standards of professional practice in all our work and contact with people; and recognizes 'safeguarding' is an organizational and an individual responsibility. All Board members, staff, volunteers, MPSSS representatives, visitors and vendors (both employed or otherwise and referred to collectively as 'MPSSS Team' in this policy) will be made familiar with the value and process of safeguarding children and vulnerable adults, beneficiaries and communities in the MPSSS operational area that we come into contact with, in all that we do. Safeguarding also extends to MPSSS Team with special reference to safeguarding themselves and their colleagues at workplace including work in high-risk areas and sensitive thematic concerns in different work contexts.

MPSSS serves the underprivileged sections of the society, hailing from socially excluded communities, the Scheduled Caste and Scheduled Tribes, and religious minorities by exercising preferential actions for the most marginalized. She is committed to protect and promote the dignity of children and young people, and we therefore take their safeguarding very seriously. Even staff and volunteers may also go through challenging circumstances exposing them to risks. MPSSS envisages to have well established safeguarding systems, structures, and operational mechanisms embedded into existing policies to ensure that MPSSS does everything to safeguard the children and adults she works with, and that she provides a safe and secure working environment for everyone.

What is Safeguarding?

Safeguarding simply put is to protect adults and children to be safe from harm or damage or abuse with appropriate measure to mitigate risks in any given context.

Several factors have driven the increased attention paid to safeguarding. With increasing exposure to unsafe behavior and situations, and unpredictable natural hazards; children and adults are put to risks of being harmed and neglected. Additionally, increased reporting of exploitation, abuse and accidents to own workforce, collaborators, vendors and clients especially the last user in all businesses; from the local to international; has forced all stakeholders to relook and reexamine internal and external related policies in their ecosystem. This is especially so as countries have ratified International Conventions, treatise and legislations to be accountable to mitigate risks by people and institutions.

Scope of safeguarding policy and target group differs from organization to organization depending on their mission, scale and diversity of operations. Accordingly, the presentation and formatting of focus and mitigation too is different. The concept of safeguarding is applicable to all businesses whether they are into people, habitat, ecology or working with other entities, i.e. the state, corporate, media, advertising and PR, academia, non-profit organizations etc.

An over-arching safeguarding policy is required as a plethora of regulatory requirements, both within the country and abroad make organizations and their staffs, accountable where there is increased possibility that certain compliance requirements get missed. It also adds considerable cost to an organization's compliance budget and complexity to internal structures and information needs. Developing a strategy

to lessen the restraining effects of compliance activities on the organization and its work is critical for its successful implementation.

Safeguarding Role of MPSSS

MPSSS is the social wing of the Catholic Church founded by CBMP and it underpins its work on the social teachings of the Church. As the Church will embed 'safeguarding' as this is a value of its mission statement and social teachings so do MPSSS abide by international development standards to be responsible for care of staff, children and adults they work with.

Therefore, a new policy and practice is to be adopted by MPSSS in safeguarding. This safeguarding policy and procedures will cover entities, staff and other relevant people, vulnerable adults, children and the organization's reputation. These include:

- i. Staff of MPSSS employed on full time or short positions, consultants on contracts and volunteers.
- ii. All the Governing Body Members and the General Body Members
- iii. Vendors and all the service providers
- iv. Partner organizations
- v. MPSSS's image, use of assets and result based interventions

The safeguarding requirements are applicable to all the staffs, board members and affiliates all the time both during and outside the office work.

All forms of harassment, exploitation, and abuse, including sexual misconduct and trafficking, are prohibited conduct as per this policy. Harassment and sexual misconduct—as defined below—typically refers to prohibited conduct in the context of the workplace—for example, behavior by the staffs and affiliates of MPSSS towards other MPSSS's staff, affiliate, visitor, partner, supplier, or service provider staff; or partner, supplier or service provider staff conduct directed at the staffs and affiliates of MPSSS. Exploitation and abuse, neglect including trafficking—as defined below— typically refers to prohibited conduct by MPSSS staff and affiliates against all other persons, foremost children, vulnerable persons and the program participants of MPSSS.

The organization then has a crucial role to play in the prevention, identification, reporting and redressal processes to keep staff children and vulnerable adults safe. These processes will take special precautions and ways of redressal for children and adults including those who are potentially more vulnerable to risk of harm. The organization is cognizant of special circumstances or contexts of work that can put children and adults at risk such as work in DRR and ER; anti-trafficking and work in conflict areas with different kinds of risks and mitigation needs.

Purpose of the Safeguarding policy

This safeguarding policy and practice will cover entities, vulnerable adults, children and MPSSS's reputation. This means making secure MPSSS Team, its buildings/work spaces, by ensuring safe recruitment of staff and volunteers and designing the delivery of her programs and work in communities in a safe manner that is monitored for violations.

The purpose of this policy is to guide MPSSS Team with a clear process to ensure:

- Awareness to build safeguarding capabilities: To live and work in a safe and protect children and vulnerable adults from all forms of harm, abuse, neglect and exploitation where possible, regardless of gender, age, ethnicity, disability, sexuality, sexual identity or beliefs.
- Learning to report abuse to evolve behaviors: Prevention, identification, reporting and redress processes for behavior change and/or disciplinary measure.
- Monitoring the compliance to revive commitment to safeguard: Ensuring that person designate for Safeguarding does safeguard MPSSS Team including whistle blowers by operating within a clear framework and defined procedures.

The above requires safe recruitment and training to minimize the risk of abusers entering the organization and mechanism to maintain safety and security. The monitoring and reporting process helps MPSSS to grow in their safeguarding role.

Implications for the Partners

A policy on safeguarding is non-negotiable. Each partner will comply with this policy to effectively implement the policy requirements in child protection, gender, inclusion, thematic concerns and financial regulations. Therefore, partners must have their own Safeguarding Policy that provides the same or a higher level of protection than this policy, in full compliance with local law and best practice or abide by MPSSS's Safeguarding Policy for the duration of the partnership agreement/arrangement.

1.2 Scope and limitation

Scope

MPSSS takes responsibility to a practice that protects their image, their staff, partners, children and vulnerable adults they come in contact with from any harm. This Safeguarding policy provides definitions and guidance on how to apply and implement this policy throughout the organization with suggested

Most of the Aid agencies like Plan International and Save the Children have scoped safeguarding to sexual abuse, harassment and exploitation with children and adults they come in contact with. Others like World Bank, OXFAM and DFID include safeguarding sustainability, natural resources, worker's rights, and exclusion of geographies, marginalized people, abilities, sexual orientation and age. Civil society groups have worked in different sectors to deal with discrimination in policies to make change at the level of procedure. For example, in Australia, the elderly can work till any age as the country has recognized age discrimination and worked on it actively.

procedures, in relation to MPSSS, its partner organizations and in the community in MPSSS operational areas.

Safeguarding and protection measures are also implemented through other MPSSS in-house policies and procedures. These policies need to be read along with this safeguarding policy as an umbrella framework. Every policy when breached in the safe guarding context will need to be revised to include safeguarding elements.

Limitation

This safeguarding policy limits itself to the communities MPSSS and its partners work in. If any transgression is observed or brought to the notice of MPSSS outside their constituency, MPSSS and its partners will report to appropriate authorities.

1.3 Policy authority and designate

Currently, the policy authority is the MPSSS management and the policy designate is the Finance Cum Admin Officer for the implementation of all in-house policies.

It is suggested that an internal 'Safeguarding Committee' be constituted for a period of two years, while the policy authority and the policy designate continues its role. This safeguarding committee will be responsible to revise all internal policies and guidelines for inclusion of appropriate safeguarding remit and procedures. This committee will also be responsible for overseeing the process of embedding safeguarding policy practice and monitor the change in behavior and program approach. To this end, contract a Safeguarding Officer dedicated to coordinate change in practice for a period of two years. S/He will report to the Steering committee.

Following the successful embedding process, the safeguarding remit will transfer on to the Admin Cum Finance Officer

1.4 Safeguarding Policy Principles

This MPSSS safeguarding policy underpins the social teachings of the Church and MPSSS's vision and mission as mentioned in the strategic plan (2020 to 2025). It focuses on the principle of Catholic Social Teachings (CSTs) for establishing and safeguarding justice and dignity, as the guiding force of the Strategic Plan. Following are the safeguarding policy principles:

- a. Underpins the CSTs of justice and dignity
- b. Abides by the Values and Mission of MPSSS
- c. Its compliance to the safeguarding policy is non-negotiable
- d. Is everyone's responsibility

1.5 Legal backdrop

The MPSSS safeguarding policy will be implemented within the relevant Indian legal framework. Given below is a list of relevant legislations for reference.

- a. National and global need; legislations and reporting; government safety standards; The Forest Rights Act, The SC/ST (Prevention of atrocities) Act 1989; (Panchayat) Extension to scheduled areas act 1996, POSCO Prevention of Sexual Harassment Act 2013, Juvenile Justice and Care Act, Child Protection Act and the new amendment; Child Labor Prohibition Act 1986, Migrant Workmen (regulation of employment and conditions of service 1979),

Rights of Persons with Disabilities Act; Mental Health and Care Act, Anti-trafficking bill; Immoral Traffic (Prevention Act) 1956, Child Marriage Act.

- b. Reference to the various judgments; the CSR discourse; Workmen compensation etc.
- c. The emerging relevant draft bills in the making are – Draft Personal Data Protection bill 2018 of India; Compliance of the existing General Data Protection Regulation (GDPR) of the European Union; Trafficking of Persons bill 2018.

1.6 Definitions

Affiliate

includes any intern or volunteer working in service to ORGANIZATION over a period of time, whether paid or unpaid, university interns, and others with a similar type of relationship to ORGANIZATION.

Partner

any entity formally engaged by ORGANIZATION (under a grant, contract, cash contribution or memorandum of understanding) to implement programmatic deliverables for the purposes of improving outcomes of vulnerable populations.

Service Provider

entity that provides services in exchange for payment, term most frequently used for specific categories of businesses such as consulting, legal advice, and telecommunications.

Supplier

entity that provides goods or services to another business or directly to the customer

Child

In the context of MPSSS work with Children in the Catholic Church and the UN CRC¹ a “child” is a defined as anyone under eighteen years of age at the time when an offence or alleged offence took place.²

Vulnerable adult

Vulnerable adult in context of MPSSS work, a person aged 18 or over, in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.’

MPSSS’s policy applies to all children and vulnerable adults with whom MPSSS has contact regardless of gender, religion or ethnicity. MPSSS has in place other employment and organizational policies that complement the Safeguarding Policy and help ensure the safety of everyone.

¹Article 1, UN Convention on the Rights of the Child

²Adapted from SCIAF Safe guarding policy and practice

Child and vulnerable adults safeguarding

This is the term used to describe the responsibilities and activities undertaken to prevent or to stop children and vulnerable adults being abused or ill-treated.

All children and vulnerable adults deserve the opportunity to achieve their full potential. The following outcomes are central to their wellbeing.

Children and vulnerable adults need to be:

- safe
- nurtured
- healthy
- active
- respected
- responsible
- achieving

To achieve this, children and vulnerable adults need to feel loved and valued, and be supported by a network of reliable and affectionate relationships, principally within their family groups. If they are denied the opportunity and support, they need to achieve these outcomes; children are at increased risk not only of an impoverished childhood, but also of disadvantage and social exclusion in adulthood. Abuse and neglect pose particular problems.

Safeguarding

Safeguarding refers to the activities undertaken to protect specific children and vulnerable adults who are suffering or are of suffering Significant Harm (ill-treatment, including physical, sexual and other forms of abuse, or the impairment of health or development).

Safeguarding and promoting the welfare of children and vulnerable adults is defined as:

- Protecting children and vulnerable adults from maltreatment, abuse and exploitation
- Preventing impairment of children and vulnerable adults' health and development
- Ensuring that children are growing up with safe and effective care
- Ensuring that vulnerable adults receive safe and effective care
- Enabling children to have optimum life chances and enter adulthood successfully
- Enabling vulnerable adults to have optimum life chances.

Effective safeguarding is essential as part of wider work to safeguard and promote the welfare of children. However, all agencies and individuals should aim proactively to safeguard and promote the welfare of children and vulnerable adults so that the need for action to protect them from all risk of harm and abuse is reduced.

Understanding Abuse³

³ Adapted from National Guidance for Child and Vulnerable Adults Safeguarding in Scotland, The Scottish Government 2010, Save the Children UK Child and Vulnerable Adults Safeguarding Policy and the Caritas Internationalis Child and Vulnerable Adults Safeguarding Policy Framework.

Child abuse is a general term used about situations where the child may experience harm, usually as the result of failure on the part of the parent or carer to ensure a reasonable standard of care and Safeguarding. Somebody may abuse or neglect a child by inflicting, or by failing to act to prevent, significant harm to the child. It is normally categorized into four main forms - physical, sexual and emotional abuse, and neglect. It is often the case that a child discovered to be suffering one form of abuse will also be experiencing others.

Children may be abused in a family or in an institutional setting, by those known to them or, more rarely, by a stranger. Child abuse takes place within the context of the family, or outside the family - for example, in institutions, at work (child labour), on the streets (street children), in war zones and emergencies. Recent cases also highlight the abuse of children by professionals or other adults who are employed in positions of trust where they care for or work with children.

Categories of Abuse

The circumstances of any one child or vulnerable adult will not always fit neatly within set categories. Nonetheless the categories form the basis of child and vulnerable adults safeguarding registration and are reflected in inter-agency guidance in relation to child and vulnerable adults safeguarding. The categories are as follows:

Physical Abuse

This is the causing of physical harm to a child or a vulnerable adult. Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a child they are looking after.

Sexual Abuse

Sexual abuse or sex abuse, also referred to as molestation, is abusive sexual behavior by one person upon another. It is often perpetrated using force or by taking advantage of another.⁴ Sexual abuse also involves forcing or enticing a child (defined as a person under the age of 18 years) to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or in watching sexual activities, using sexual language towards a child or encouraging children to behave in sexually inappropriate ways. Sexual abuse may involve siblings or other family members, or persons outside the family.

Emotional Abuse

Emotional abuse is persistent emotional neglect or ill treatment that has severe and persistent adverse effects on a child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person. It may involve the imposition of age - or developmentally -inappropriate expectations on a child. It may involve causing children to feel frightened or in danger, or exploiting or corrupting children. Some level of emotional abuse is present in all types of ill treatment of a child; it can also occur independently of other forms of abuse.

⁴ https://en.wikipedia.org/wiki/Sexual_abuse

Physical Neglect

Neglect is the persistent failure to meet a person's basic physical and/or psychological needs. Especially among the children it would have adverse effects resulting in the serious impairment of their health or development. It may involve a parent or carer failing to provide adequate food, shelter and clothing, to protect a child from physical harm or danger, or to ensure access to appropriate medical care or treatment. It may also include neglect of, or failure to respond to, a child's basic emotional needs. Neglect may also result in the child being diagnosed as suffering from 'non-organic failure to thrive', where they have significantly failed to reach normal weight and growth or development milestones and where physical and genetic reasons have been medically eliminated. In its extreme form children can be at serious risk from the effects of malnutrition, lack of nurturing and stimulation. This can lead to serious long-term effects such as greater susceptibility to serious childhood illnesses and reduction in potential stature. With young children in particular, the consequences may be life-threatening within a relatively short period of time.

Harassment

Harassment can take many forms. It may be, but is not limited to, words, signs, offensive jokes, cartoons, pictures, posters, statements, pranks, intimidation, physical assaults or contact, or violence. Harassment is not necessarily sexual in nature. It may also take the form of other verbal activity including derogatory statements not directed to the targeted individual but taking place within their hearing. Other prohibited conduct includes taking retaliatory action against an employee for discussing or making a harassment complaint. It is also against MPSSS' policy to download inappropriate pictures or materials from computer systems

Sexual Harassment

Sexual harassment may include 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 it contributes at creating an intimidating, hostile, degrading, humiliating or offensive environment. It may include unwelcome sexual advances, requests for sexual favours, or other verbal or physical contact of a sexual nature. It is important to note that sexual harassment crosses age and gender boundaries.

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 Labour:
The term "child labour" refers to any economic activity performed by a person under the age of 15
3. 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
4. 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, drug, shelter, money and any other essential needs for integral human survival.

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/ Whistle blower

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

Safety and health of staff and MPSSS Team within a work context involves risk/hazard identification and mitigation according to government standards. This involves ongoing safety training and education for staff to prevent, report and address abuse and harm caused by bullying, harassment, sexual misconduct, breach of dignity and exclusion as provided in the FRA, PESA and SCST Acts. Workplace safety regulated by Migrant Workers, Workmen Compensation and ESI ACT that compensate for injuries and illnesses occurring while at work.

Security at work is often considered by a person before joining an organization and this is gender neutral and ability sensitive.

It is the responsibility of the organization to provide safety at work and to secure working environment for not only its staff but for those who come in contact with its workforce. It is also important to conduct safety and security checks from time to time for further strengthening and improvement.

[Safeguarding shapes the organization's approach, practice and culture to ensuring a comprehensively safe environment for all people that the organization engages with.](#)

Section II: MPSSS Safeguarding Policy

1. Policy statements

1.1 At the community level

- i. MPSSS recognizes its responsibility to safeguard the wellbeing, safety and protection of all people, be it children, adults, partners and other institutions it works with in different work spaces, work contexts and thematic concerns directly or indirectly in the field.
- ii. MPSSS strongly believes and is committed to safeguarding; hence, MPSSS recognizes the need for appropriate mechanisms for safety, protection, monitoring, reporting, redress and healing.
- iii. MPSSS expects all partners to provide the same, or a higher, level of protection for children and vulnerable adults provided for in this policy in accordance with applicable law, regulation and best practice.
- iv. MPSSS believes all children and adults without exception have the right to protection from abuse and exploitation including Child labour regardless of gender, age, ethnicity, disability, sexuality, sexual identity or beliefs. Therefore, MPSSS prohibits all their board members, Staffs and affiliates from involving in any kind of exploitation of children such as child labor and all kinds of child abuse.

1.2 At the level of MPSSS Team

- i. MPSSS recognizes its responsibility and commitment to promote and ensure security, safety and wellbeing of MPSSS Team in its offices/work spaces and different work contexts.
- ii. MPSSS strongly believes that no individual or group will be treated less favorably than others at workplace and in the community.
- iii. MPSSS expects MPSSS Team believe and are committed to protect the image of MPSSS, its resources, its workplace/building and its programs.
- iv. MPSSS takes responsibility and expects MPSSS Team are committed to safeguard their colleagues from emotional trauma/burnout, false allegations or from operating within an unclear framework.
- v. MPSSS is committed to safeguard wrong people from entering and working in the organization.
- vi. MPSSS recognizes the need to safeguard MPSSS Team from local aggressive external troublemakers especially while working on sensitive themes and in sensitive areas.
- vii. MPSSS strongly believes and is committed to safeguarding; hence, MPSSS recognizes the need for capacity and appropriate mechanisms for safety, protection, monitoring, reporting, redress and healing. It will prescribe and ensure acceptable standards, methods or behaviors in the organization.

2. Putting Policy into Practice

2.1 Capacity for Safeguarding

- i. To begin, MPSSS commits to communicating this policy throughout the organization, its partners and other vendors; ensure a buy-in and commitment to fulfill their safeguarding obligations. The onus is also on the staff to seek information and study the policy.
- ii. All MPSSS Team, partners and relevant others introspect, review implications and standards for their domain; become aware of; are committed to and implement their safeguarding obligations. MPSSS will ensure its support to meet their safeguarding responsibilities and requirements, understand the specific risks involved in a given context and how they can work

and engage in ways that increase the safety and protection of their constituencies. This approach supports the embedding process; to become part of all-time behavior.

- iii. Ensure all staff and others (covered by this policy) understand their responsibility and role in prevention and redress of safeguarding at all times and its implications in their individual job functions.
- iv. Build individual, departmental and organizational capacity to fulfill safeguarding role and functions efficiently and effectively.
- v. Ensure a safe and trusted environment is available at all times.

2.2 Demonstrate commitment

- i. Respond quickly and appropriately to concerns raised. If need more time, convey a time period for action.
- ii. Have clear lines of accountability for safeguarding throughout the organization as set out in this policy.
- iii. Develop a sense of accountability between staff so that actual and potential abusive behavior is challenged.
- iv. Allocate a safeguarding budget.

2.3 Support extended through an enabling process

- i. Provide all MPSSS Team with guidance and support on how they should conduct and respond, if they suspect a child or adult experiencing or is at risk of abuse or harm.
- ii. Guide MPSSS staff on how to conduct themselves in prevention and if any incident occurs, then how to behave and report concerns.
- iii. Support and guide to 'move on' and heal individually and organizationally.

2.4 Breaches, Reporting, Disciplinary process

Breaches of this policy need to be reported to the relevant authority. Following which the case will be investigated for its veracity. Subsequently appropriate decision in accordance with disciplinary procedures and contractual agreements will be taken and communicated. Breaches may lead to correction of behavior where appropriate or incur sanctions including disciplinary action leading to dismissal, termination of all relations including contractual and partnership agreements, and where relevant, appropriate legal or other such actions.

If a legitimate concern about the suspected abuse of a child or young person or adult is raised but proves to be unfounded on investigation, no action will be taken against the reporter. However, appropriate sanctions will be applied in cases of false and malicious accusations.

Section III. Safeguarding Procedures – Its practice in every day work.

MPSSS's Safeguarding procedures lay down the requirements for ensuring safeguarding measures are embedded in all parts of its operations and programs. A time line with a work plan is suggested as the next section to implement this safeguarding procedure.

1. Safe Recruitment

MPSSS's normal recruitment and employment policies and procedures already provide the framework for good practice set out in its current policies. These policies have been reviewed and strengthened in the light of the principles and outcomes described in this safeguarding policy. Additionally, the candidates will be asked to describe their previous experience of working with children and vulnerable adults, to provide two referees who can comment on their work with children and vulnerable adults. This will happen with both internal and external candidates.

Advertisements and job descriptions for identified posts will include a reference to MPSSS's commitment to child and vulnerable adults safeguarding and her Safeguarding Policy. Job offers made in relation to identified posts will be subject to a self-disclosure, satisfactory clearance from checking of statutory and satisfactory verification of qualifications and work history.

A parallel practice will operate with regard to consultants and volunteers recruited or designated for work with schools or with children.

2. Reference check before being designated as a MPSSS Team

The reference could be sought from the past employers, or a government/NGO officer or attestation with a PAN card plus the Aadhar card or all. This will be followed by Police verification for no criminal record, domestic violence or sexual offense.

On arrival at MPSSS workplace, a member of the Safeguarding Committee Group would review the Safeguarding Policy as well as give advice to make sure the new comer understand fully its implications during the time they are termed as MPSSS person.

MPSSS expects that contact with children in schools and other children's spaces by staff and volunteers, will be supervised by school staff to minimize the likelihood of situations occurring in which they are the lone adult with one or more children. For example, by having another school staff present when giving children a lift in a car. If such situations are unavoidable, precautionary measures should be taken, for example leaving the door to the room open or moving to an area where you will be in plain view of others.

In any activity or event involving children which MPSSS or her partner has directly organized, a member of staff will be designated as the DSL (Designated Safeguarding Lead) or at the minimum be attended by a member of staff who has received Safeguarding training.

3. Supervision practice induction to exit

In every day work MPSSS Team come into contact with large numbers of children. This work takes place within the good practice guidance as follows:

MPSSS undertakes to ensure that all MPSSS Team whose work might involve contact with children and vulnerable adults, will have completed the following:

Safeguarding training included in induction and in annual refresher trainings for all MPSSS Team which could be done through online/offline sessions.

4. Increasing awareness for building safeguarding capacity

- MPSSS's commitment to safeguarding will be stated in appropriate publications and its website.
- MPSSS will make its policy and procedures available to anyone who requests as appropriate. All staff and volunteers will be required to sign the Code of Conduct after a thorough understanding and studying its implications with the new recruit and their JD.
- MPSSS will ensure that staff attend a detailed briefing session on Safeguarding Policy and have access to a copy. This is also included in the induction Programme for all new staff and for volunteers who may have contact with children and vulnerable adults
- All managers have the responsibility for ensuring that the staff they manage are aware of the policy, and for reminding them of its provisions when the need arises. Managers of identified posts must take part in safeguarding training
- The training needs of staff in identified posts will be assessed and relevant training provided using national agreed training resources
- Staff in sections or teams whose work involves frequent face to face contacts with supporters, or presence at local or national events, should ensure they are familiar with the detail of this policy. They should also know the identity and contact details of the Safe Guard designate i. e. Admin Cum Finance Manager and have contact details for statutory authorities including help line numbers and the Police
- MPSSS staff planning events should ensure that safeguarding issues are considered as part of the risk analysis and/or health and safety arrangements
- In planning or coordinating multi-agency or coalition or network organized events and activities, MPSSS will ensure that all safeguarding considerations have been taken into account if relevant.

5. Safeguarding Children

The UN CRC and the Indian legislations dictate the framework for operations with and for children. When we use the term children it includes both girls and boys of different age cohorts up to 18 years living in different contexts and girls and boys who are differently abled as per the RPWD Act. Thus, disaggregated data for risk practices assessment, analysis and program design is important. Many researchers have highlighted that girl and boy; children with different grades of disabilities; children in schools; children living on the streets, in institutions, even in homes experience different forms of safety issues and harmful practices. Harmful practices that are intentionally or unintentionally done with strong roots in local culture and perspectives related to childhood, child development and other local discriminatory practices. We need to ensure that children are growing up with safe and effective care and they get optimum life chances and enter adulthood successfully.

Promote need to safeguard children below 18 years as per their evolving capacity

Promoting safeguarding is a mandate for all children, all adults and all local state and private institutions who directly or indirectly interact with children.

- Protect all children below 18 years in operational areas
- Add special focus on vulnerable and marginalized children in operational areas
- Add special focus on children with disabilities
- Promote safe and inclusive communities
- Promote safe and inclusive services, buildings, public spaces and pathways/roads
- Promote active participation of children, adults and local institutions in developing and practicing protection guidelines

Build capacity of children in safeguarding

Child participation and evolving capacity is a critical right in the UN CRC. Capacity will evolve as children grow and take on more and more responsibilities and act in leadership roles. But this needs to be systematically delivered and involve children wherever appropriate. Adults then have the responsibility to showcase behavior and conduct on safety and protection in homes, in public spaces, in the community and local institutions.

- Develop capacity of children on safety of self and safety of other children
- Develop capacity of children on safeguarding at home, in the neighborhood, in children's parliaments, *Balsabhas*, schools, health centers, on the roads and any other spaces where children congregate.

Build local capacity in safeguarding

To fulfill adult obligations as per the UN CRC mandate and agreed by the Indian state, MPSSS and its partners and local interested institutions will need to develop local capacity and build consensus for change. Without the knowhow and skills, it is difficult to practice change at home and in the larger community.

- Build perspectives and promote the need to safeguard children and the responsibility of adults at homes; in *Anganwadis*, schools, tuition centers, arts and craft, dance, music, painting, sports centers; in the community and in the local institutions (Panchayat, PHC etc) of both state and private bodies in MPSSS operational areas.
- Promote the development of guidelines for practice in the above listed institutions and public spaces.
- Build capacity of adults and institutions who directly or indirectly work with children.
- Develop capacity in inclusion and safeguarding children including children with special needs.
- Develop capacity in risk assessment, monitoring, reporting and correction in safeguarding.

6. Safeguarding Vulnerable Adults

MPSSS works with vulnerable and marginalized communities who are more at risk to safety, security and harmful practices rooted in the local culture, beliefs and local power equation. Similar to working on safeguarding with and for children; safeguarding vulnerable and marginalized adults will also entail working with them, the larger community and the local institutions. A doubly disadvantaged group within them will be persons with disabilities; the dependent frail and elderly, the very ill with near absence of any support mechanism for day to day needs and/or financial assistance. Many studies have highlighted the high incidence of abuse, neglect, homelessness and danger to life that these people face on a regular basis.

MPSSS defines vulnerable adult as:

- Elderly and frail
- Has a mental health disorder including dementia or a personality disorder
- Has a physical or a personal disorder
- Has a severe physical illness
- Is a substance abuser
- Is an unpaid carer
- Is homeless, displaced or exploited
- Has a learning disability

We need to ensure that vulnerable adults receive safe and effective care and get optimum life chances with dignity. Unlike bringing change in the children's world; bringing change in attitudes, beliefs and behaviors towards vulnerable and marginalized adults and those with disabilities is very challenging.

Promote the need to safeguard vulnerable adults

- Promoting safeguarding is a mandate for all adults and all local state (*Panchayat*, PHCs, *Gram Sabhas*, various state units) and private institutions working in MPSSS operational areas.

- Promote safety and security of all vulnerable and marginalized adults in the MPSSS operational areas
- Promote safe and inclusive communities
- Promote safe and inclusive services, buildings and pathways/roads
- Promote active participation where feasible in developing and practicing protection guidelines

Build capacity to deal with drug peddlers and other related substances in the community

It is critical to control the source, sale and access to drugs and other forms of substances as they are not only a risk to adults but also to children and young people in the community and thereabouts.

- Involve the local community and local state institutions to tackle the source and access to drugs and other substance use. Build local capacity in safeguarding against them.

Build capacity of vulnerable adults in safeguarding

- Build local community-based rehabilitation initiatives
- Build community-based support initiatives for unpaid carers

MPSSS and its partners, the local community and local institutions will need to develop capacity to practice safeguard vulnerable adults

- Build perspectives and promote the need to safeguard vulnerable adults at homes; in the community and in the local institutions (panchayat, PHC etc) of both state and private bodies in MPSSS operational areas.
- Promote the development of guidelines for practice in the above listed institutions and public spaces.
- Build capacity of adults and institutions who directly or indirectly work with vulnerable adults.
- Develop capacity in inclusion and safeguarding vulnerable adults.
- Develop capacity in assessment, monitoring, reporting and correction in safeguarding.

7. Safeguarding Programs / Themes /Project cycle

Safeguarding in overall programming

- All partners (current and potential) to be informed that the need for a **safeguarding policy and procedure** with each partner is a mandatory requirement. If they do not have but in principle agree with the concept and practice of safeguarding, and are willing to follow the MPSSS safeguarding policy and procedure document and subsequently want to develop their own policy, should be sufficient to start the partnership if all other requirements are met.
- Clarify **theme** specific risk assessment, prevention and mitigation requirements.
- A safeguarding focused risk assessment will take place for every new **project** as part of the risk assessment process during the project design phase. Add a specific section on safeguarding risks (potential or real) to children and vulnerable and marginalized adults in all strategies and projects of MPSSS.
- A risk assessment will also be conducted for any other **activity** directly involving vulnerable adults and/or children, including fundraising and communications activities where contact is made and information on individuals is gathered.
- The risk assessment will include **mitigating** actions, which will be incorporated into project design/documentation. This may include supporting training of partner staff.
- A risk assessment and mitigation **monitoring** exercise should be conducted every 6 months in all projects as part of project reporting exercise; and mid project if the total project duration period is less than 1 year.

Safeguarding in theme specific risk assessment, protection and mitigation

Acknowledging safeguarding risks and implementing measures to address them is fundamental to an organization's strategies and governance. The more this is recognized, the more risks can be prevented. To achieve this MPSSS and its partners need to consider:

- i. Where, when and how does this theme affect children, vulnerable adults including the staff and affiliates of MPSSS and what risks this presents?
- ii. What procedures are needed to prevent harm and how to respond to concerns appropriately?
- iii. Who is the appropriate designated person/s to act as the safeguarding thematic focal point to receive and manage any safeguarding concerns and subsequent inquiry/investigation?
- iv. What safeguarding induction and training is needed to ensure staff members know what is expected of them and what to do if they have a concern?
- v. A clear code of conduct so that all staff understand their professional boundaries when working with children and vulnerable adults and what is and is not acceptable behavior.

SITUATIONAL ASSESSMENT AND PLANNING

If potential partners are already practicing even some elements of safeguarding, then MPSSS can move ahead seeking information on the following list. This list is not exhaustive, but gives an initial information base to make 'safeguarding' a work in progress with the partners, as long as they are in agreement with this approach.

Log Frame Analysis (LFA)

Include columns on safeguarding risk assessment and mitigation strategies; and activities and outputs within a timeline.

Conduct a Safeguarding risk assessment as a bench marking exercise in the proposed operational area to look into the following:

- i. Environmental sensitivity, protection and sustainable growth especially in areas prone to natural and/or man-made disasters
- ii. Social discrimination or harmful practices including neglect and acts of omission towards children and vulnerable adults in the community
- iii. Documentation of safe and positive practices as part of local culture

Safeguarding risks and vulnerability mapping of the proposed project target/beneficiary group in the proposed operational area

- i. List who are the project's target/beneficiary group(s) and their population size in the proposed operational area.
- ii. Why have they been identified? Please specify.
- iii. Map the safeguarding risks they face on a day-to-day basis – what risks,

Safeguarding risk assessment approach of potential Partners:

- i. What and whom do partners safeguard?
- ii. Do partners have a written safeguarding policy and procedure document?
- iii. How safe relationships are monitored in controlled groups in projects eg children's parliament, *balsabhas*, women's groups, community based organizations etc.?
- iv. What infrastructure safety and security measures are followed?
- v. Do partners have a financial and/or material safety and security policy?
- vi. Do staff and relevant others have a code of conduct?

IMPLEMENTATION AND MONITORING SAFEGUARDING

Do a midterm appraisal of the risk mitigation referred in the log frame.

Do a complete safety and security scan against the initial bench mark exercise and give the program manager a safeguarding score that finds a mention in the annual performance appraisal of the lead person in-charge.

EVALUATION

Include appropriate questions related to safeguarding.

Documentation for institutional learning

Lessons in safeguarding to be filtered and documented to improve gaps in safeguarding policy and procedures; training and development for staff and partners to improve programs on the ground

8. Safeguarding safety and security

Safety and health of staff within a work context involves risk/hazard identification and mitigation according to government standards. This involves ongoing safety training and education for staff to prevent, report and address abuse and harm caused by bullying, harassment, sexual misconduct, breach of dignity and exclusion as provided in the FRA, PESA and SCST Acts. Workplace safety regulated by Migrant Workers, Workmen Compensation and ESI ACT that compensate for injuries and illnesses occurring while at work.

Security at work is often considered by a person before joining an organization and this is gender neutral and ability sensitive.

It is the responsibility of the organization to provide safety at work and to secure working environment for not only its staff but for those who come in contact with its workforce. It is also important to conduct safety and security checks from time to time for further strengthening and improvement.

Importance of Safety and Security

Workplace safety and security is basically the process to protect an employee from work related illness and injury and to make the workplace (building etc) safe from any injury or harm and secure from intruders and internal pilferage. Every company should have an Environmental, Safety and Health Policy statement, in other words, a workplace safety plan.

Security is one of the most vital aspects that a person looks in a workplace before joining an organization. It is the responsibility of the organization to provide a secure working environment to its employees. Therefore, proper security systems like CCTV and other security equipment should be in place so as to monitor the incomings and outgoings. Using biometric scans or other such devices ensure that only employees can enter or leave the office building. A well-lit room and building is another essential requirement of safety and security for staff. It is also important to conduct security checks from time to time such that the loopholes (if any) can be looked into. This way the security system can be regularly monitored and improved.

Along with the physical security of the employees, it is essential to ensure that important data, networks, software, equipment and company's assets are also protected. With a proper security program in place, the company premises will have higher standards. It will also ensure that a neat and clean environment is maintained. The employees form the backbone of a company. Protecting the employee details and the workplace means keeping everyone secure and the working environment is much healthier. Communications among employees will increase and it contributes towards a happier workplace. An organization should set up a strong security system and the staff should also co-operate to ensure their safety and the safety of critical information and assets are not compromised.

Checklist of key aspects of building/workplace security

Security awareness— build security awareness, the in-house security plan and their responsibility to all staff. The office administration has additional responsibilities compared to other staff.

Building security guidelines – develop office building security guidelines and place them on notice board with special notices in special rooms for quick reference.

Building maintenance – develop guidelines to monitor building maintenance such as any weak structures that can cause injury or serious accidents; lighting of rooms, corridors, washrooms etc; hanging live electric wires; regular maintenance of the lift system; fungal infected walls in work spaces; use of pesticides; quality of drinking water etc.

Access control facility and authority— Facilities are different parts of an office building that have different access control and authority. For instance, in many organizations there is limited access to the HR and accounting areas. The employee or the visitor has to take permission to get clearance to these two departments. Data storage units and warehouses too have their own access control guidelines. It basically places control on the access and usability of a sensitive asset. Authority is the person designated by the organization with complete charge of the safety of a particular organization asset.

- Information security especially employee data and any other confidential data.
- Data, encrypted information and Network security should be another priority of the company. For data security, the network should not be shared with any outsider and should be strictly for office purposes. Access to server rooms or data closets should be limited.
- Store spaces and warehouses areas where materials (for relief or otherwise) are kept also have clear access control system.
- All staff should be aware of authorized and unauthorized access

Building surveillance

- Gates - If the opening and closing of the main gates of the office building are a part of the access control system then, the security check starts at the entry level itself. It should be paired with a surveillance device like CCTV such that the staff can confirm the entry of a visitor. The opening and the closing of the gates are generally operated through specialized locks now.
- Exterior doors - After the main entrance (gates) comes the security of the exterior doors. The employees can simply use their ID cards to open the doors or use biometric scans while the visitors are directed to a particular entrance. A visitor's card should be given to them (even with known vendors) for the time they are in the office building.
- Biometrics -The biometrics has become a common part of the security system used in the office buildings. Fingerprint, retina and hand geometry are some of the common variations of the biometrics in large offices. Organizations have to make their own decisions.

Medical emergencies

- Keep medical emergency numbers of ambulance service, doctors, nearby hospitals for ready use; pin them on the notice board and in corridors or rooms for quick access; office administration to be responsible with someone designated to periodically update these numbers. Many organizations have a couple of doctors screened from the neighborhood for consultations on any emergencies; or a doctor's panel
- Develop guidelines on how to address emergencies while on official travel or in the field.
- Develop guidelines on informing key people in office(s) and family of the person especially in serious cases.

Protection from accidents including fire, theft, fraud, hooliganism

Fire safety

- A part of building maintenance to monitor electric circuits and wiring; cooking gas leakage; positioning of inflammable material such as gas cylinders, manual file stores. Offices building with heavy wooden wall paneling are potential inflammable fire hazard. Office administration is normally in charge with someone designated for periodic physical monitoring and supervision. This includes fire extinguishing equipment
- Put a fire safety system in place along with the state Fire department in the neighborhood.
- Every staff member should be aware of the fire drill and how to kick start action for protection and extinguishing. Have one or two fire drills with staff in a year
- Include safety and security knowhow as part of inducting new staff
- Train all staff to operate a fire extinguisher
- Develop guidelines and train staff on what to do and how to evacuate a room or the building.

Theft/Fraud

- Develop safety guidelines for use within office and on travel. Include cash in transit while bringing cash from the bank/ATM especially for use in emergencies
- Develop guidelines for use of personal equipment and vehicles for sudden emergencies when official equipment or vehicle is not available.

Hooliganism

- Develop prevention and protection guidelines with the support of local police
- All staff to be aware of what to do when there is potential danger or sudden actual episode takes place
- Office administration is normally in charge in such exigencies.

Disasters and Emergencies

- Prevention preparedness in and out of office – develop guidelines for fire safety measures; accidents; medical; personal safety; health care that includes physical, mental and emotional wellness; personal conduct and behavior
- Disaster preparedness and management - Include guidelines on what to do when an emergency arises or get caught in a sudden riot or in an earthquake, floods. Train staff on these and include in the induction plan for new staff
- Evacuation – develop guidelines for evacuation of the office building. Include guidelines on what to do if caught in any other building or in any other emergency such as a sudden riot, local hooliganism. Train staff on these and include in the induction plan for new staff
- Emergency exits – safeguard these exits by keeping them open without any clutter
- Periodically check whether the doors open out in emergencies. Do not block the exit with anything even with a pile of papers.

Security audit

- Conduct periodic and surprise checks to see and improve safety and security measures
- Develop tailor made security and safeguarding audit checklist
- Office administration is normally the overall in charge with persons designated for individual or multiple tasks.

Monitor maintenance and capacity of assets and hardware

- Timely, regular maintenance of office assets and hardware is critical for its smooth and efficient function for higher productivity, safety and emotional wellness of staff
- Monitor vendors for quality and timely output. If not delivered, change vendors.

9. Procedure to reporting a safe guarding complaint and the role of the Whistle blower 5

Definition

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.

Anonymous complaints

It can be difficult in some circumstances to speak out openly therefore MPSSS 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 MPSSS, 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 which the malicious accusation was made publicly known, MPSSS will take due care to rehabilitate and restore their reputation.

Whistle Blower

It takes one person to recognize abuse, violation or a safeguarding misconduct. This person who raises the concerns and reports to the Manager HR a safe guarding complaint is the Whistle Blower. Indian legal process on Whistle Blowing and protection has not got clearance. It refers to financial misconducts like bribery and fraud.

Whistle blowing as an important safe guarding role is encouraged and protected by MPSSS. Often a person who reports a matter is coerced to take back the complaint. For this reason, reporting of the matter is to be done in confidence to the Manager HR, who will take charge of the issue to take it to a positive resolution.

MPSSS prohibits any employee from retaliating in any way against anyone who has raised any concern about harassment, sexual harassment, fraud, abuse, trafficking, misconduct or discrimination against another individual within or outside the organization. No adverse employment action will be taken for any employee making a good faith report of violation, harassment or abuse. Any staff or associate who has knowledge or suspicion of a potential breach of the MPSSS 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.

Who can be a whistle blower to make a complaint under this policy?

1. Complaints received by MPSSS against a partner organization will be referred back to the partner organization for follow-up and action.
2. MPSSS's staff and associates

All employees, and particularly managers, have a responsibility for keeping the work environment free of harassment and abuse. Any employee who becomes aware of a safeguarding incident, whether as a witness, or being told of it, or being the object of it, is strongly encouraged to report it in accordance with the safeguarding policy and the MPSSS Complaint Handling Procedure (MPSSS CHP). When supervisors or coworkers become aware of possible safeguarding lapses like a security and safety breach, financial irregularity or a fraud, trafficking of persons (within or outside the organization), harassment or all kinds of abuse of any MPSSS person or associate, child or a vulnerable adult they should immediately bring it to the attention of the Admin Cum Finance Officer personally or in writing or through the below mentioned E-mail ID.

E-mail for safeguarding complaints: director@mpsss.org

⁵Adapted from Caritas Internationalis Complaints Handling Mechanism - Policy and Procedure

Possible complaint may include, but are not limited to

1. Behavior or conduct of MPSSS Team
2. Behavior or conduct of partner organization staff and associates
3. Financial improprieties such as misuse of funds, fraud or corruption
4. Harassment, including sexual exploitation and abuse
5. Emotional abuse such as intimidation, humiliation, bullying and mobbing
6. Any act of trafficking within the organization or in the community
7. Safety and security breach that will harm the organization and its people

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, whistle blower, 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, MPSSS 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, child rights, and sexual harassment, criminal or other). Complaints that indicate a possible criminal offence should be referred by MPSSS to the authorities responsible for investigating such matters.

What can a Whistle Blower keep in mind while witnessing a complaint?

- Information offered in confidence should be received on the basis that it will be shared with relevant people in authority: this might include the Admin Cum Finance Officer and the members of the safeguarding committee and/or, if appropriate, safeguarding personnel in statutory agencies
- Parents or carers will also be informed if appropriate and in cooperation with statutory authorities or relevant agencies
- Apart from this, confidentiality shall be maintained.

If a child or vulnerable adult tells you they are being, or have been, abused:

- Listen to and accept what the child or vulnerable adult says
- Immediate action must be taken to ensure the child or vulnerable adult's safety
- Do not investigate and do not inform, question or confront the alleged abuser
- Take the alleged abuse seriously
- Reassure the child or vulnerable adult that they have done the right thing by telling you
- Let them know you need to tell someone else. Do not promise total confidentiality
- Let the child speak or vulnerable adults freely but do not press for information
- Let the child or vulnerable adult know what you are going to do next and that you will let them know what happens
- Record carefully what you have heard whilst it is still fresh in your mind. Include the date and time of your conversation and any incident disclosed. (Refer to Concern form in the Annex).

Steps to take when suspecting abuse

If any member of staff or volunteer suspects abuse, or if a child or vulnerable adult makes a disclosure, or if a person external to MPSSS reports a suspicion or allegation relating to MPSSS Team, or its activities, the following steps should be taken:

- Avoid any delay
- Report to the Admin Cum Finance Officer or in their absence another member of the MPSSS Safeguarding Committee
- If the suspicion or allegation relates to activities or persons working in a school, parish or diocesan setting, ensure that the relevant representative is also informed
- The Safeguarding Committee will ensure appropriate follow up. If urgent action is required to protect children this should be done immediately.
- **No staff member or volunteer will prejudice their own standing or position within MPSSS by responsibly reporting potential or suspected child abuse.**

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 competent Bishop.

What complaints will not be processed?

Complaints related to member organizations staff grievance, performance issues, employment and labor matters, hostile work environment, harassment on the workplace are dealt exclusively by member organizations through appropriate country legislation and HR policies and procedures (Refer HR policy).

Working with partner organizations

MPSSS will strategically and consistently encourage partner organizations to develop their own complaints handling mechanism by:

- **Providing support for setting up contextualized Complaint Handling Mechanism (CHM)** and raising awareness on expected behavior and channels for complaining by providing support for capacity building with regards to investigations and attempt to build a harmonized system of support
- **Handling abuse with the principle of best interest of the child in view.** MPSSS recognizes that allegations (i.e. when a specific allegation of abuse is made against a named individual) and concerns (i.e. when concern is expressed about abuse that may have taken place or be in prospect) should always be taken seriously and acted upon swiftly, making the welfare of children the paramount consideration. The principle of 'best interests of the child' and the desire to secure the best outcomes for the child should always govern decisions regarding what action to take in response to concerns.

10. What will MPSSS do to strengthen safe guard practice?

MPSSS Management has designated the Admin Cum Finance Officer who is responsible for managing safeguarding within the organization, by regularly reviewing and improving systems, policies and procedures and overseeing the handling of safeguarding cases. S/he is the executive secretary to a Safeguarding Committee that can be called to action when deemed necessary by the Executive Director who regularly participates in meetings. The Manager HR will be responsible to implement the Safeguarding Plan agreed by the board based on the availability of resources. The Executive Direct will

depute staff to raise resources for the safeguarding mandate of MPSSS. The terms of reference for the MPSSS's Safeguarding Committee and the safeguard role to add to Manger HR Job description is annexed for a reference.

If a member of staff is the subject of an allegation of child abuse or abuse of a vulnerable adult, that staff member will be asked to take leave from their duties on full pay until an investigation has been completed. If a MPSSS volunteer or relevant other (i.e. paid consultant or journalist working on behalf of MPSSS is the subject of an allegation of child abuse, that volunteer or relevant other will be asked to withdraw from their work until an investigation has been completed. In both cases, it should be made clear that suspension does not imply guilt but rather protects all parties whilst an investigation is undertaken.

Sexual violence and child abuse are first and foremost a personal tragedy for the people who have been harmed. In the event of any allegations, MPSSS's first concern will always be to care for their emotional, physical, psychological and social well-being. MPSSS undertakes to provide support for the alleged victims, witnesses and the alleged abuser whilst an investigation is carried out. MPSSS will also seek to ensure that any continuing support needed after a situation has been resolved is made available.

If a disclosure of abuse takes place in which the alleged abuser is a member of MPSSS staff, a volunteer or relevant other, or the incident has taken place on MPSSS premises or in connection with MPSSS activities, MPSSS will inform the police and statutory authorities.

If a suspicion is expressed, MPSSS will undertake a risk assessment and then take appropriate action, which may involve contacting statutory authorities. A thorough internal investigation to establish what happened and determine how the case should be handled in accordance with MPSSS policies and procedures precedes handing case to the statutory authorities. The aim of this investigation is to determine whether there was a breach of code of conduct or of the policy and procedures. It is not a criminal investigation into the allegations of abuse in order not to prejudice the policy investigation and subsequent prosecution.

If an allegation of abuse is made involving a member of MPSSS staff, this allegation, together with a record of the investigation undertaken and the outcome, will be recorded in a separate personal file. Confidentiality regarding these records will be scrupulously maintained and information will only be released to the line management of the staff member concerned or to those in positions of authority externally who have reason to need it for the safeguarding of children or vulnerable adults. Records will be kept for 10 years and disposed after recording data on nature of complaint and resolution for reference of safeguarding system improvement.

After the case has been investigated internally, MPSSS will conduct a learning reflection of its management of the case. Key learning points will be incorporated in appropriate policy and practice revision.

Complaint Handling Procedure

If you suspect a child or vulnerable adult is being physically, sexually or emotionally abused you should report your suspicions on MPSSS's Concern Report Form and pass it immediately to MPSSS HR Manager or in their absence another member of the MPSSS Safeguarding Committee.

If a child or vulnerable adult discloses to you abuse by someone else you should listen, offer support, understanding and reassurance whilst explaining you have to tell appropriate people. As soon as

possible you should report your suspicions on MPSSS Concern report form and pass it immediately to the MPSSS Safeguarding Coordinator or in their absence another member of the MPSSS Safeguarding Committee.

In all cases:

- Take emergency action if required – contact police/social services/medical services immediately as required if it is an emergency situation
- Record everything that was said, including dates, times of conversation and any incidents disclosed
- You must refer
- **You must not investigate.**

Partners Complaint Reporting

If a complaint is from someone not present and is among the MPSSS's partners, it should be referred to the MPSSS Safeguarding Committee who will note this issue on a log. The MPSSS Safeguarding Committee will follow up with the partner to ensure that the case has been reported to the relevant bodies and is being managed appropriately. All such issues will be escalated to the Executive Director and Board. The MPSSS Safeguarding Committee will inform the appropriate regulatory bodies and the donor as required.

MPSSS undertakes to provide support for the alleged victims, witnesses and the alleged abuser whilst an investigation is carried out. MPSSS will also seek to ensure that any continuing support needed after a situation has been resolved is made available.

If a member of MPSSS staff, volunteer or anyone else associated with MPSSS work in some recognizable capacity is found to have committed acts in relation to children or vulnerable adults which are criminal or which contravene in a serious way the principles and standards set out in this policy, MPSSS will refer these to the appropriate authorities and will also take disciplinary and/or any other action which may be appropriate to the circumstances, such as termination of contracts and the ending of volunteering relationships. MPSSS has a legal obligation to refer the person being removed from contact with children to any relevant professional bodies.

Receiving a complaint

Formal complaints should be made in writing or via e-mail to MPSSS Admin Cum Finance Officer. If a 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 MPSSS CHM including the possibility of making an anonymous complaint. The complainant decides whether to formally submit a complaint or not. Complaints submitted to MPSSS will be opened only by the Admin Cum Finance Officer. The complainant will receive notice of receipt within one week.

Recording the complaint

Complaints will be recorded onto an internal MPSSS system. It will have restricted staff access, and will support complaints being logged on receipt, actions tracked and outcomes recorded. The recorded complaint for related to a child within 24 hours needs to be submitted to the district Child Welfare Committee. Therefore, the MPSSS Complaint Handling Mechanism should source the reporting template required by the state authority. The record of sexual harassment at work place needs to also be submitted to the district authority annually. Thus, logging complaints is a legal requirement.

Processing the complaint

It is the responsibility of the Admin Cum Finance Officer 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 Safe Guarding Committee which is also a Complaints Handling Committee. Sensitive complaints will be dealt with as per the procedure set forth ahead. The roles and responsibilities of MPSSS and partner organizations will be determined at that stage.

As a general rule:

1. Complaints against MPSSS staff and associates will be dealt at the level of the head office directly.
2. Complaints against those deployed through MPSSS support will be coordinated by the appropriate seconding MPSSS entity. The seconding MPSSS organization has the primary responsibility to appropriately investigate the complaint while MPSSS HO retains the right to oversee the investigation.
3. Complaints that involve MPSSS partners 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 partner organization, MPSSS will work together with the partner organization in carrying-out the investigation while simultaneously strengthening their internal procedures and capacities to deal with complaints.
4. If a partner organization is unwilling to act upon the complaint, MPSSS HO will inform the relevant Authority so that the adequate investigation can take place.
5. Complaints that involve more than one MPSSS partner organization will be coordinated with the relevant MPSSS Board. The MPSSS Director Administration will assume a facilitating role to assure a transparent, impartial and consistent course of action.

When a complaint is handed back to the partner organization, the partner organization will within thirty days report to MPSSS on determination of the breaches and action plan, investigation plan and, if needed, requests the support of the HO.

Sensitive complaints

Sensitive complaints will be immediately referred to the MPSSS Administration who 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 only to the Admin Cum Finance Officer, those relating to financial improprieties will also be shared with the MPSSS Admin Cum Finance Officer and the Program related breaches to the Admin Cum Finance Officer. 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 MPSSS Code of Conduct, MPSSS Code of Ethics, MPSSS Safeguarding Policy and that refer to partner organization head by MPSSS. These complaints follow the strict rule of confidentiality and need-to-know basis so 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 regarding the names of the complainant, accused, victim, witnesses or whistle blowers.

Investigation process

The Admin Cum Finance Officer 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 shall be involved in the process. Complex sensitive complaints shall be investigated by external qualified experts from a preselected and verified pool of investigators. The Admin Cum Finance Officer shall 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 shall be shared with the Executive Director for review and approval. The decision on the type of action to be undertaken at the completion of the investigation process by the Executive Director or if the same is accused then the President of MPSSS board would review and make the final decision based on the investigation report. Costs associated with investigations initiated as a result of complaints against MPSSS staff and associates shall be covered by MPSSS. Costs associated with investigations initiated as a result of complaints against those deployed through MPSSS support mechanisms shall be covered by the partner organization(s). Should this not be possible, alternative funding sources will be explored.

Communicating outcomes

The MPSSS HO will provide feedback to the complainant and those involved in the complaint as appropriate. In case of a sensitive complaint, the complainant, unless he is at the same time the victim, has no “right” to know the outcome of the investigation. The MPSSS shall provide the complainant with the information whether the complaint has been substantiated or that the complaint is not substantiated. No other information or detail shall be disclosed.

Appeals procedure

All complaint has to 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 MPSSS Executive Director. This can be done in writing, by letter or email.

Annex 1 - MPSSS Safeguarding the communication about children and vulnerable adults

- MPSSS Team should try and make sure that those who may wish to use images/stories of children or vulnerable adults cannot misuse or exploit them. Producing communications about children would count as indirect contact if consent is not signed up from the child and their guardian or the vulnerable adult.
- MPSSS Team should always acquire informed consent from the child's parent/guardian, the child's school or the NGO/Partner responsible for the child, and from the children themselves to use the images and stories for MPSSS publications. However, it is not necessary to gain specific individual consent for those in crowd shots. With vulnerable adults their consent or depending on the nature of their vulnerability their guardian's consent must be sought.
- Personal information about a child that could be used to identify his/her specific location within a country should not be used to accompany images.
- In addition, MPSSS communications about children and vulnerable adults should respect their dignity and identity and not degrade them. Therefore, when communicating about children and vulnerable adults care should be taken to:
 - Portray them as realistically as possible and communications about children and vulnerable adults should not be sensational, or overtly sentimental
 - Take care to represent the ethnic diversity of the children and vulnerable adults in areas where MPSSS works
 - Try to represent children and vulnerable adults as individual human beings, with their own opinions and history
 - Images of nude or partially clothed children or adults should not normally be used, although in portraying the lives of children in developing countries in a realistic way this may be appropriate and indeed unavoidable. However, images of children in state of undress should not present them in poses that could be interpreted as sexually suggestive or in ways that impact negatively on their dignity or privacy. Should staff wish to use this type of imagery, they should consult the MPSSS Safeguarding Committee to discuss whether it is appropriate
 - Be aware that certain children and vulnerable adults may need extra safeguarding. For example, former child soldiers, those suffering from HIV and AIDS and victims of violence, abuse and exploitation. For example, children and vulnerable adults that have experienced violence or are in some way particularly vulnerable or if identified, should not have their faces displayed or be represented in a way that may lead to their identification
 - In many cases it might be appropriate to withhold or change names
- Decisions about the appropriateness of the use of images of children and vulnerable adults by MPSSS should be made by the Head of Communications and Education or the Communications Manager.
- Journalists and photographers working with, or on behalf of MPSSS will be asked to sign the Code of Conduct as al MPSSS Team.

Annex 2 -MPSSS Team Safeguarding Code of Conduct

As an employee or representative of MPSSS, I will promote its values and principles and protect its reputation by:

- Respecting the basic rights of others by acting fairly, honestly and tactfully, and by treating people with dignity and respect, and respecting the national law and local culture, traditions, customs and practices that are in line with Catholic Social Teaching, moral teaching and UN conventions
- Working actively to protect children and vulnerable adults by complying with MPSSS's Child and Vulnerable adults Safeguarding Policy and Procedures
- Maintaining high standards of personal and professional conduct
- Protecting the safety and well-being of myself and others
- Protecting the organization's assets and resources
- Reporting any matter that breaks the standards contained in this Code of Conduct.
- Maintaining high standards of personal and professional conduct means I will not behave in a way that breaches the code of conduct, undermines my ability to do my job or is likely to bring MPSSS into disrepute.

For example, I will not:

- Engage in sexual relations with a child or a vulnerable adult or abuse or exploit a child or a vulnerable adult in any way regardless of the age of majority or age of consent locally. Mistaken belief in the age of a child is not an excuse
- Exchange money, employment, goods, assistance or services for sexual favors or other forms of humiliating, degrading or exploitative behavior
- Engage in any form of harassment, discrimination, physical or verbal abuse, intimidation, favoritism or exploitative sexual relations with staffs affiliates of the organization or even the program participants and community members.
- Drink alcohol or use any other substances in a way that adversely affects my ability to do my job or affects the reputation of the organization.
- Be in possession of, nor profit from the sale of, illegal goods or substances.
- Accept bribes or significant gifts (except small tokens of appreciation) from governments, beneficiaries, donors, suppliers or others, which have been offered as a result of my employment.
- Undertake business for the supply of goods or services to MPSSS with family, friends or personal contacts or use MPSSS assets for personal benefit.
- Behave in a way which threatens the security of myself or others.
- Use the organization's computer or other equipment to view, download, create or distribute inappropriate material, such as pornography.

In relation to child and vulnerable adults safeguarding, It is important for all staff and others in direct contact with children to:

- Be aware of situations which may present risks and manage these.
- Plan and organize the work and the workplace so as to minimize risks.
- As far as possible, be visible in working with children or vulnerable adults.
- Ensure that a culture of openness exists to enable any issues or concerns to be discussed.
- Ensure that a sense of accountability exists between staff so that poor practice or potentially abusive behavior does not go unchallenged
- Talk to children or vulnerable adults about their contact with staff or others and encourage them to raise any concerns

- Empower children or vulnerable adults - discuss with them their rights, what is acceptable and unacceptable, and what they can do if there is a problem.

Staff, volunteers and relevant others must never:

- Hit or otherwise physically assault or physically abuse children or vulnerable adults
- Develop physical/sexual relationships with children or vulnerable adults
- Develop relationships with children or vulnerable adults which could in any way be deemed exploitative or abusive
- Act in ways that may be abusive or may place a child or a vulnerable adult of abuse.
- Staff and others must avoid actions or behavior that could be construed as poor practice or potentially abusive. For example, they should never:
 - Use language, make suggestions or offer advice which is inappropriate, offensive or abusive
 - Behave physically in a manner which is inappropriate or sexually provocative
 - Spend excessive time alone with children away from others
 - Take children or vulnerable adults to your home, especially where they will be alone with you. Have a child/children or vulnerable adult(s) with whom they are working to stay overnight at their home unsupervised
 - Sleep in the same room or bed as a child or vulnerable adult with whom they are working
 - Do things for children or a vulnerable adult of a personal nature that they can do for themselves
 - Condone, or participate in, behavior of children or vulnerable adults which is illegal, unsafe or abusive
 - Act in ways intended to shame, humiliate, belittle or degrade children or vulnerable adults, or otherwise perpetrate any form of emotional abuse
 - Discriminate against, show differential treatment, or favor particular children or vulnerable adults to the exclusion of others.

I..... do hereby confirm that I have read, understood and commit myself to comply and to be held accountable for any non-compliance and non-reporting.

I also have read and understood the MPSSS Safeguarding policy and procedures document to know about the aspects of safeguarding that relate to my role that I summarize as under in my own words

(Signature)

Date:

Please note: you should keep this copy of the policy for your records. An additional acknowledgement form will also be issued for your signature and which will be kept internally.

Annex 3 – The safeguarding mechanism

Terms of Reference for MPSSS (MPSSS) Safeguarding Committee

1.1. Background

MPSSS as part of an ongoing move to improve accountability towards all those it serves; individuals and communities, and partner organizations, has established a Safe Guarding Committee as part of 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.

The legal basis of this CHM is the MPSSS Safe Guarding Policy and Procedure document that is applicable to MPSSS staff, board members, volunteers, interns, consultants, contractors, and partner organizations staff. The Safe Guarding Committee does not replace individual complaints mechanisms that partner organizations and staff members already have in place. It provides an alternative and complementary channel for managing complaints that can be activated in predetermined circumstances and when certain conditions are met. MPSSS recognizes that the primary responsibility to handle complaints remains with partner organizations. Together with the MPSSS Admin Cum Finance Officer, the Safe Guarding Committee is instrumental to ensure that all complaints received will be dealt with according to agreed procedure and guidelines.

1.2. Objective

To support the Admin Cum Finance Officer in making appropriate decisions on complaints received through the MPSSS CHM, in accordance with agreed procedures and guidelines.

1.3. Composition

The Safe Guarding Committee is composed as follows:

1. The Admin Cum Finance Officer; 2. One MPSSS Board member; 3. The MPSSS Executive Director; 4. Invited specialist (internal); 5. Invited specialist (external).

Invited specialist members of the Safe Guarding Committee are nominated by the Executive Director of MPSSS in consultation with the Admin Cum Finance Officer.

1.4 Responsibilities

The Safe Guarding Committee is responsible to

- Review the complaint and approve the course of action proposed by the Admin Cum Finance Officer
- Suggest an alternative action if applicable
- Review and approve the final investigation report or seek additional information if applicable;
- Request an independent investigation following reports which are not deemed satisfactory and/or are not reconsidered for revision by the member organization involved;
- Recommend appropriate disciplinary actions, if applicable. The final decision is taken by the Executive Director.

1.4. Confidentiality

Members of the Safe Guarding Committee are bound to treat all information received with utmost confidentiality. Breach of confidentiality leads to immediate suspension and the application of an adequate disciplinary measure against the involved member.

1.6. Sensitive complaints

Sensitive complaints follow the strict rule of confidentiality and need-to-know basis. The Safe Guarding Committee will provide the counterparts of the partner organizations 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 regarding the organizations involved, the names of the complainant, accused, victim, witnesses or whistle blowers.

1.5. Meetings

The MPSSS is responsible to organize the meetings of the Safe Guarding Committee. The members of the Safe Guarding Committee are required to prioritize their participation in meetings to make sure that complaints are dealt with in a timely manner.

Duration

Safe Guarding Committee members are appointed for a duration of two years. They can be renewed for another two years by the MPSSS Executive Director in consultation with the Admin Cum Finance Officer.

Safe Guarding inserts for the Job Description of the Admin Cum Finance Officer

1.1. Background

MPSSS has established a Safe Guarding Committee that has been recommended by the Safe Guarding Policy and Procedure as a channel for managing safeguarding complaints. The Admin Cum Finance Officer will be the executive secretary of the Safe Guarding Committee and will be in charge of initiating a session when a complaint needs to be reviewed and followed.

1.2. Objective

To ensure that all complaints received through the MPSSS Safe Guarding Committee are dealt with in a timely and fair manner, in accordance with agreed procedures and guidelines.

1.3. Functional Responsibilities

Under the guidance of the Executive Director

- Receive and acknowledge complaints in a timely manner
- Screen and assess the type and nature of the complaint and recommend the most appropriate course of action to be undertaken
- Coordinate meetings with the Complaints Handling Committee
- Refer complaints relating to sexual exploitation and abuse to the MPSSS Executive Director.

Coordinate and facilitate investigations

- Provide feedback to the complainant and those implicated in the complaint as appropriate
- Ensure confidentiality at all times
- Identify external qualified experts to investigate complex sensitive complaints

- Ensure that member organizations to whom complaints are handed back report on the outcomes of the investigation to MPSSS in a timely manner
- Set-up an internal complaint recording system, enter and track all complaints received and ensure proper documentation of responses and outcomes are recorded in the system
- Support MPSSS partner organizations to strengthen their internal procedures and capacities to deal with allegations of abuse and exploitation
- Ensure that MPSSS Team, board members, volunteers, interns and contractors are adequately oriented on the Safe Guarding Policy and Procedures.
- Identify partner Organizations with Safe Guarding Committee experience to act as champions towards other partners
- Work with MPSSS Communications to develop safeguarding messages
- Ensure that information about how and where to complain is kept updated and available on the MPSSS website and social media pages.

1.4 Experience

- Substantial experience in leading on the investigation of complex complaints and drafting high level reports
- At least 5 years' experience in similar position
- Excellent knowledge of the MPSSS
- Proven experience in training design and delivery.

1.5. Skills

- Ability to rapidly assimilate a range of complex information and make expert judgments
- High level of accuracy and attention to detail
- High level communications skills
- Ability to deal with conflicting demands ensuring key priorities and deadlines are met through effective time management
- Strong understanding and ability to apply international standards on protection and accountability
- Excellent verbal and written communications skills in English and fluency in a local language is an asset

1.6 Reporting line

Direct to the MPSSS Executive Director if the complaint is against the manager level staff member. If the complaint is against the Executive Director this Complaint Handling Officer reports to the President of the Board. The Admin Cum Finance Officer as the Complaint Handling Officer will have a close working relationship with the MPSSS legal advisor.

Annex4 –Safeguarding Concern Report Form

Confidential

Name of the person affected		Position	Address. Telephone and Email	
Nature of Concern	Violation of Child or Adult	security breach of organization	Other	
Complaint mode (attach evidence)	Telephone/whats app	In Person	Letter/ e-mail	
Summary of concern				

Information received at (time):

On (date):

Information received by

Name of the Whistle Blower	Position	Address Telephone and Email

This form, along with all relevant documents, should be retained securely and forwarded to the MPSSS Finance Cum Admin Officer as soon as possible.

Alleged victim/survivor, child, or vulnerable adult

Name	Age	Gender	Address	Phone and email

Name of Parent/Guardian/Carer:

Name	Age	Gender	Address	Phone and email

Person alleged as responsible

Name	Age	Gender	Address	Phone and email

Concern

Record details of allegation(s) or concern(s). If information is given in person, record as precisely as possible what was actually said, the location of the conversation and the identities of persons present. If the space provided is not sufficient, please continue on a separate sheet and attach herewith.

Completed by: (signature)

Print name: (in full)

Date:

Actions and Further Information

Record all actions taken, agencies contacted and information/advice received with times and dates. Entries to be signed.

Action Taken

Action Taken By (Name address, phone and email)	Action	Date

Resolution statement

Is the concern addressed adequately? (Yes / No / Maybe / Don't know)

Comments:

Signatures with date

Complainant	Breach rectifier /Person against who complaint was made	Safeguard Representative	Expert Internal	Expert External
