



Applies to:

All staff, interns, volunteers, sub-recipients, implementing partners, suppliers, service providers, visitors (worldwide), donors, beneficiaries, and board members

Created on:	3rd August 2022
Review Date:	

Purpose:

1. It is the mission and values of the North East Diocesan Social Service Society (NEDSSS) to safeguard human life, and it is firmly rooted in the belief that each individual is a unique creation created in the image and likeness of God.
2. A culture of safety and prevention of harm is also fundamental to our identity as a humanitarian and development organization.
3. By having this policy, we're making clear that those included in its scope are morally and legally obligated to treat everyone with respect; to actively prevent all forms of harassment, abuse, and exploitation, including all forms of sexual harassment and human trafficking.

Scope:

4. The NEDSSS's Safeguarding Policy applies to all the **North East Diocesan Social Service Society** staff, including, board members, and "affiliates", which includes interns and volunteers.
5. Safeguarding requirements for partners, service providers and suppliers are detailed in paragraph 37 and 38.
6. The NEDSSS Safeguarding Policy is applicable and binding regardless of geographical location, contractual status, administrative independence of a subsidiary entity, or local context.
7. This policy applies to NEDSSS staff and affiliates' activities and behaviors at work, outside work, and while on leave.

Policy

8. NEDSSS is committed to creating and maintaining an environment—both in our workplace, in our projects, and in the communities in which we work—that promotes our core values and prevents the harassment, abuse, and exploitation of all with whom we interact.
9. All forms of harassment, exploitation, and abuse, including sexual misconduct and trafficking, are prohibited conduct 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 NEDSSS staff or affiliates towards other NEDSSS staff, affiliate, visitor, partner, supplier, or service provider staff; or partner, supplier or service provider staff conduct directed at NEDSSS staff or affiliates. Exploitation, neglect and abuse, including trafficking—as defined below— typically refers to prohibited conduct by NEDSSS staff and affiliates against all other persons, foremost children, vulnerable persons and NEDSSS program participants.



Definition of Safeguarding

10. NEDSS defines Safeguarding as its responsibility to ensure that our staff and programs honor and protect the rights and dignity of all people – especially children and vulnerable adults – to live free from abuse and harm. This responsibility is codified in our Policy on Safeguarding, which sets clear standards for NEDSS staff, Board Members, affiliates, and those with whom we work – partners, suppliers, and service providers – regarding their obligations to respect all people and to actively prevent harassment, abuse, and exploitation, including all forms of sexual harassment and human trafficking. The persons included in the scope of this policy are obligated to protect those who work for us, those with whom we work, and those whom we serve.

Prohibited Conduct

Harassment

11. General harassment is unwanted, unwelcomed and uninvited behavior that demeans, threatens or offends and results in a hostile environment. Harassment is typically targeted at an individual, or a particular group of individuals. This includes, but is not limited to, harassment based on ethnicity, color, religion, sex, age, sexual orientation, national origin or ancestry, disability, medical condition, marital status, or veteran status.
12. General harassment is not sexual in nature and may consist of verbal or physical conduct that insults or shows hostility or aversion towards an individual or group of individuals. Some examples of conduct that may constitute harassment (but not limited to) are: (a) the use of derogatory statements, or abusive words or phrases, jokes, unwelcome pranks, slurs, negative stereotyping, or threatening, and other intimidating or hostile acts (b) written or graphic material that insults, stereotypes or shows aversion or hostility towards an individual or group and that is placed on walls, bulletin boards, email, voicemail, or elsewhere on the NEDSS's premises, or circulated in the workplace; and (c) a display of symbols, slogans, or items that are associated with hate or intolerance towards any select group.

Bullying

13. Bullying, defined as persistent and repeated mistreatment of one or more targeted persons by one or more perpetrators and includes (but is not limited to) threats; intimidation; public humiliation/name-calling; persistent and unwelcome teasing; abuse or use of power to undermine, humiliate or denigrate; intentional work interference/sabotage; or stalking. While harassment is usually based on protected characteristics and may be easier to spot, bullying can occur to anyone and may be more subtle and accumulative.

Sexual Harassment

14. Sexual harassment can cross age and gender boundaries and may include unwelcome sexual advances; request for sexual favor; verbal or physical conduct or gesture of a sexual nature; or any other behavior of a sexual nature that might reasonably be expected/perceived to cause offense or humiliation to another and when such conduct interferes with work; is made a condition of employment; or creates an



intimidating, hostile or offensive work environment. Sexual harassment can be verbal, physical or visual. It includes actions directed at an individual or actions observed by an individual.

- a) **Verbal sexual harassment:** includes requests of a sexual nature made by one person to another. When from a supervisor or superior, these requests may demand or imply a condition of employment or compensation, either implicitly or explicitly, or when an employment decision is based on an individual's acceptance or rejection of such conduct. When such requests are from NEDSSS staff to a partner or supplier staff these requests may imply a condition of continued cooperation, commercial or otherwise.
- b) **Physical sexual harassment:** includes unwanted or inappropriate leering or touching of any kind, unwelcome sexual advances. Stalking may also be associated with sexual harassment.
- c) **Visual sexual harassment:** includes the sharing or posting of images that create an offensive, hostile or intimidating environment or interferes with an individual's job performance. Examples include—but are not limited to—displays of sexually explicit or demeaning materials such as offensive pictures, cartoons, symbols, or items in the workplace.

Exploitation

15. Exploitation is the use of force or other forms of coercion, abduction, fraud, deception, abuse of power or position of vulnerability; or the giving or receiving of payments or benefits to achieve the consent of a person having control over another person.

Forms of exploitation:

16. **Sexual Exploitation** is any actual or attempted abuse of 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.
17. **Child Labor** is work that deprives children of their childhood, their potential, and their dignity, and that is harmful to a child's physical or mental development. It is work that can be mentally, physically, socially or morally dangerous and harmful to children. It is work that interferes with their schooling by:
 - a. Depriving them of the opportunity to attend school;
 - b. Obliging them to leave school prematurely;
 - c. Requiring them to attempt to combine school attendance with excessively long and heavy work.
18. NEDSSS staff and affiliates are prohibited from hiring children under the age of 15—regardless of any perceived benefit to the child or family—and prohibited from funding programs in which child labor, as defined above, is occurring. Hazardous work is prohibited for all children, including children aged 15-17 years. This includes construction and manufacturing work.

Abuse

19. Abuse is a deliberate act of ill treatment that can harm a person's safety, well-being, dignity and development. It often involves individuals who have a relationship of responsibility and care for the victim including project staff, parents, guardians, teachers, community workers, health-care providers, religious leaders, friends or other children.

Forms of abuse:

20. **Sexual Abuse:** actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.



21. **Physical Abuse:** Non-accidental use of physical force that inadvertently or deliberately causes a risk of or actual injury or suffering. Physical force includes but is not limited to hitting, shaking, kicking, pinching, pushing/pulling, grabbing, burning, female genital mutilation, torture, and other physical acts.
22. **Emotional Abuse:** Harm done by persistent or severe emotional ill-treatment or rejection, such as degrading punishments, threats, bullying, and not giving care and affection, resulting in adverse effects on the behavior and emotional state of an individual or the behavior and development of a child or young person.
23. **Neglect/Negligent Treatment:** Allowing for context and resources, the failure to meet the basic physical and/or psychological needs either deliberately or through negligence of a child or individual under the responsibility of the care giver/guardian. Neglect includes but is not limited to failing to provide adequate food, sufficient or seasonally-appropriate clothing and/or shelter; failing to prevent harm; failing to ensure adequate supervision; failing to ensure access to appropriate medical care or providing inappropriate medical treatment (e.g., administering medication when not authorized); or failing to provide a safe physical environment (e.g., exposure to violence, unsafe programming location, unsafe sleeping practices, releasing a child to an unauthorized adult, access to weapons or harmful objects, failing to child-proof a space that children will occupy, etc.).

Trafficking

24. Trafficking in persons is a form of exploitation. Trafficking is defined as the recruitment, transportation, or receipt of persons by means of deception, coercion, threat, or force for the purpose of exploitation such as for labor, prostitution, or sexual exploitation.
25. NEDSS places a special focus on anti-trafficking of women and children, given their specific vulnerability and given the cruelty and perversity to which trafficked women and children are particularly subjected.
26. The following are types of prohibited exploitative conduct that are common to human trafficking schemes, in accordance with the elements defined above: forced prostitution and child pornography; forced marriages; illicit organ trade; narcotics smuggling; forced begging or labor.
27. All NEDSS staff are also prohibited from employment practices related to trafficking, including:
 - d. Destroying, concealing, confiscating, or otherwise denying access to an employee's identity or immigration documents.
 - e. Using misleading or fraudulent practices to recruit employees such as failing to disclose key terms and conditions of employment or charging employees recruitment fees.
 - f. Using recruiters that do not comply with local labor laws or charging employees recruitment fees.
 - g. Failing to provide return transportation to any employee specifically brought to a country for the purpose of working on a project.
 - h. Providing or arranging housing that fails to meet host country housing and safety standards.
 - i. Failing to provide a valid employment contract or work document where required by law.
28. NEDSS also prohibits staff from knowingly obtaining work-related goods or services that have been provided or produced by trafficked or forced labor.



Sexual Activity

29. All sexual activity with a child, defined as a person younger than 18 years of age, is considered sexual abuse and is prohibited regardless of the age of majority or consent locally. Mistaken belief in the age of a child is not a defense.
30. To prevent sexual exploitation from occurring, NEDSSS prohibits NEDSSS staff, board members, affiliates and visitors from buying sex (prostitution) by offering money, gifts, or other material support, regardless of the age or affiliation of the individuals selling sex.
31. Sexual relations between staff/affiliates and program participants (of any age) are prohibited and are grounds for termination. The only exception is a consensual relationship between a staff member and a program participant; in such a case, the employee must fully disclose the relationship to their supervisor, human resources, or the senior management at the outset of employment or the relationship.
32. All staff must always ensure their relationships with program participants or potential program participants do not involve any form of exploitation or abuse.

Standard of Behaviors towards Children

33. When interacting with child project participants, all staffs are prohibited from:
 - a) Unsupervised or unsolicited interaction with the children
 - b) Spending excessive or unnecessary time alone with a child
 - c) Encouraging a child to interact in a manner that is unrelated to official duties, including:
 - Encouraging a child to meet outside of work-related activities
 - Befriending or sending private messages to a child via email, whatsapp, facebook or any other social media platform.

Supplier (Vendor) and Service Provider Code of Conduct

34. As a supplier/service provider of NEDSSS and (name of supplier/service provider) commits to the following:
 - Prohibit all forms of exploitation and abuse (including sexual exploitation and abuse, trafficking in persons, involuntary and child labor).
 - Not recruit or employ children less than 18 years of age; not recruit or employ children less than 18 years of age for work that is mentally or physically dangerous or interferes with the development of a child and their schooling.
 - Ensure systems are in place to actively prevent, address and respond to exploitation and abuse.
 - Provide accessible and confidential reporting options for employees and other stakeholders to report concerns or suspicions of exploitation and abuse as described above.
 - Protect reporters or whistleblowers from retaliation.
 - NEDSSS reserves the right to conduct due diligence audits or assessments to monitor compliance and will take reasonable steps to investigate or otherwise take appropriate action to address concerns identified.
 - NEDSSS reserves the right to terminate any relationship for non-adherence to the above-mentioned requirements.
 - Should supplier/service provider become aware of any suspected cases of exploitation or abuse as it relates to the implementation of this agreement, NEDSSS requires supplier/service provider to report through any of the following channels:
 - Director: 6003457308
 - Programme Coordinator: 8822938249



- Email address: alert.nedsss@gmail.com

Safeguarding Clause for Implementing Partners/Subrecipients

35. The subrecipient must adopt and comply with NEDSSS's "**NEDSSS's safeguarding policy**" or an equivalent policy. In addition to complying with any donor required reporting, the subrecipient must immediately report to NEDSSS via **director/programme coordinator, email id: alert.nedsss@gmail.com, contact: 6003457308/8822938249.**
- Allegations involving abuse and/or exploitation—including trafficking of persons, involuntary or child labor - that relate to programming or staff funded by NEDSSS.
 - Allegations that are not directly related to programming or staff funded by NEDSSS but could be reasonably expected to impact the relationship between the subrecipient and NEDSSS or the reputation of the subrecipient or NEDSSS.
 - Following the reporting of an alleged safeguarding violation, the subrecipient will fully cooperate with NEDSSS to undertake any investigative or corrective actions NEDSSS deems appropriate.
 - Failure to comply with this provision may result in termination of this agreement without penalty to NEDSSS.

Safe Recruitment

36. The objective of recruitment and selection of an employee is to choose and place the right and suitable person for a more efficient and effective work. The organization shall use both internal and external sources of recruitment. The recruitment and selection process of all posts shall be in compliances with the "**Human Resource Policy**" of NEDSSS.

Mandatory Safeguarding Orientation

37. It is mandatory that all staff, interns, volunteers, partners, sub-recipients, suppliers, service providers, visitors (worldwide), beneficiaries, and board members receive safeguarding orientation before signing the Safeguarding Policy contract.

Mandatory Reporting

38. All NEDSSS staff, board members, and affiliates are obligated to report any concerns or suspicions of any forms of harassment, abuse and exploitation described above involving NEDSSS staff, board members, affiliates, partners, program participants, suppliers, service providers or aid workers associated with another organization. The concern may be a result of witnessing the incident, being told of it, or being the object of it.
39. All such required reporters should report all concerns through any of the following channels:
- Executive Director (directornedsss@gmail.com/6003457308)
 - Programme Coordinator (alert.nedsss@gmail.com/8822938249)
 - Designated Safeguarding Committee Members (DSCM): 8134030696/6001990143/9957736566
 - In writing to the following address:
The Executive Director,
North East Diocesan Social Service Society (NEDSSS)
Joypur, Kharghuli, Guwahati – 04
 - Reporters should report in the reporting format available in the official website: <https://www.nedsf.net/>



40. The reports of alleged safeguarding violations should include as much information as is readily available, such as:
 - a) Date, time and location of the incident
 - b) Nature of what happened
 - c) Any immediate help or actions required
41. Intentional false or malicious reporting may result in disciplinary action.
42. NEDSSS is committed to ensuring that program participants—and members of communities in which they live—are aware of what staff behavior is acceptable and how they can raise their concerns or questions in a confidential and secure manner. NEDSSS will ensure communication is systematic throughout project planning; and community-based feedback, complaints and response mechanisms are available.

Protection of Whistle-blowers

43. NEDSSS is committed to the protection of whistle-blowers and prohibits any form of retaliation (e.g. dismissal, victimization, harassment or any other detrimental treatment) against any individual reporting an allegation or participating in an investigation in good faith.

Confidentiality

44. NEDSSS acknowledges and respects the courage and trust associated with reporting allegations of harassment. To the extent possible, NEDSSS seeks to maintain the confidentiality of allegations, survivor/victim, reporter, witnesses and subjects of complaint, understanding confidentiality can be critical to safety/security, reputation and well-being.
45. It is important for all reporters to understand, however, that NEDSSS may be legally mandated to follow up on certain allegations (with donors, or authorities in the case of a potential criminal offense) and that strict confidentiality cannot always be guaranteed due to the NEDSSS's moral and/or legal obligation to report and investigate.
46. In instances where there is a legitimate belief that an investigation could put the reporter, survivor, witnesses or anyone else in danger, NEDSSS will take reasonable steps to protect the safety and security of those perceived to be at risk.

Support to Survivors and Safety/Security

47. NEDSSS will provide immediate and appropriate support to safeguarding survivors. Support may include specialist psychosocial counselling, a medical or legal referral, support to address security concerns, and/or access to other support, as needed and appropriate.

Investigation

48. Under no circumstances, should any of NEDSSS staff assess or investigate an allegation or a reported allegation on their own, outside of standard reporting protocols.
49. The NEDSSS will follow up and investigate all safeguarding reports according to its investigation procedure, and legal and statutory obligations.

Non-Retaliation

50. NEDSSS and its staff are prohibited from retaliating—in the form of an adverse employment action or harassment—against any individual reporting an allegation in good faith or participating in an investigation. Any form of retaliation may result in disciplinary action up to and including termination.



Adherence

51. Failure to adhere to the provisions stated above may result in a range of actions and consequences. For staff this could include (but is not limited to): verbal warnings, written warnings, mandatory training or counseling, suspension, and/or termination of employment. Serious harassment such as sexual abuse and exploitation as well as persistent and severe forms of harassment is cause for immediate termination, in line with the local labor law.
52. Knowingly facilitating or aiding another aid worker to perform acts of exploitation or abuse is strictly prohibited and will be addressed in the same manner as when such an activity is undertaken directly by NEDSSS staff.

Interpretation and Questions

53. Questions on the interpretation of this policy—and any other questions—can be directed to alert.nedsss@gmail.com/ directornedsss@gmail.com.

Related Policies and Resources

- HR Policy of NEDSSS
- Children's Policy of NEDSSS
- Gender Policy of NEDSSS
- Investigation procedure of NEDSSS

Key Words:

Safeguarding, conduct, harassment, bullying, sexual harassment, abuse, exploitation, child labor, trafficking, survivor, confidentiality, investigation, retaliation, affiliate, sub-recipients, partners.

Glossary

- **Affiliate:** includes partners and any intern or volunteer working in service to NEDSSS over a period of time, whether paid or unpaid, university interns, and others with a similar type of relationship to NEDSSS.
- **Child:** anyone under the age of 18 years of age.
- **Partners:** any entity formally engaged by NEDSSS (under a grant, contract, cash contribution or memorandum of understanding) to implement programmatic deliverables for the purposes of improving outcomes of vulnerable populations.
- **Sub-recipients:** any entity formally engaged by NEDSSS (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.
- **Stalking:** unwanted and/or repeated surveillance by an individual or group toward another person. Stalking behaviors are interrelated to harassment, bullying and intimidation and may include following or monitoring the victim.
- **Supplier:** entity that provides goods or services to another business or directly to the customer.
- **Survivor:** a person who has experienced or has been exposed to a safeguarding concern. "Survivor" is generally preferred in the psychosocial support sector – in contrast to the term victim - because it implies resilience.



- **Survivor-Centered Care:** care that is responsive to a survivor's needs and preferences, and seeks to protect survivors from stigma, discrimination, retaliation or other harmful consequences.