

Code of Conduct in relation to Safeguarding / Sexual Exploitation and Abuse

Purpose

The purpose of this Code of Conduct in Relation to Safeguarding / Sexual Exploitation and Abuse (“Code of Conduct”), is to protect people, particularly children, at risk adults and beneficiaries of project work, from actual harm that may be caused as a direct consequence of involvement with WACC staff, contracted personnel, or projects. This includes harm arising from:

- The conduct of staff or contracted personnel
- The design and implementation of WACC’s programmes and activities

This Code of Conduct lays out the commitments made by WACC and informs staff and contracted personnel of their responsibilities in relation to safeguarding, sexual exploitation and abuse.

This Code of Conduct does not cover:

- Sexual harassment in the workplace – this is dealt with under WACC’s Health and Safety Policy¹
- Safeguarding concerns in the wider community not perpetrated by WACC or contracted personnel

What is safeguarding?

Safeguarding means protecting people’s health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect.

In the context of WACC, it means protecting people, including children and at risk adults, from harm that arises from coming into direct contact with our staff or programmes.

Further definitions relating to safeguarding are provided in the Glossary below.

Scope

This policy applies to:

- All staff or consultants contracted by WACC.

¹ Some NGOs are now including workplace bullying and harassment in their safeguarding portfolio, as it relates to harm caused by coming into contact with staff or programmes. However accompanying procedures for dealing with workplace bullying and harassment are likely to be different, due to legal and statutory differences in handling workplace incidents

- Contracted personnel whilst engaged with work or visits officially related to WACC, including but not limited to the following: officers and board members; consultants; volunteers; contractors; any person representing WACC in an official capacity.
- Staff or contracted personnel of partner organizations who are receiving financial support from WACC.

Policy Statement

WACC believes that everyone, regardless of age, gender identity, disability, sexual orientation or ethnic origin has the right to be protected from all forms of harm, abuse, neglect and exploitation. WACC will not tolerate abuse and exploitation by staff or contracted personnel. These standards apply at all times, not only in the workplace.

WACC commits to addressing safeguarding throughout its work, through the three pillars of Prevention, Reporting and Response.

Prevention

WACC responsibilities

WACC will:

- Ensure all staff / contracted personnel have access to, are familiar with, and know their responsibilities within this Code of Conduct.
- Design and undertake all its programmes and activities with the intention of protecting people from risk of harm that may arise from their coming into contact with WACC. This includes the way in which information about individuals in our programmes is gathered and communicated.
- Implement safeguarding procedures when recruiting, managing and deploying staff and contracted personnel.
- Ensure staff / contracted personnel receive ongoing and updated training on safeguarding at a level commensurate with their role in the organization.
- Formally designate the most senior staff member (General Secretary) to be the safeguarding officer of the organization. In the event of a safeguarding incident, the General Secretary will report the incident to the President of the organization.
- Formally designate the President of the organization as the lead Trustee to ensure that the Board is kept abreast of safeguarding issues and requirements.
- Ensure that regular reporting be directed to the Officers and the Board of Directors through a standing agenda item in regular meetings or through the risk register update.

Staff / Contracted personnel responsibilities

Child safeguarding

WACC staff and contracted personnel and project partners must not:

- Engage in sexual activity with anyone under the age of 18.
- Sexually abuse or exploit children.
- Subject a child to physical, emotional or psychological abuse, or neglect.

- Engage in any commercially exploitative activities with children including child labour, trafficking or pornography.

Adult safeguarding

WACC staff and contracted personnel and project partners must not:

- Sexually abuse or exploit at risk adults.
- Subject an at risk adult to physical, emotional or psychological abuse, or neglect.

Protection from sexual exploitation and abuse

WACC staff and contracted personnel and project partners must not:

- Exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance.
- Engage in any sexual relationships with beneficiaries of assistance, since they are based on inherently unequal power dynamics.

Additionally, WACC staff and contracted personnel and project partners are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Code of Conduct.
- Report any concerns or suspicions regarding safeguarding violations by a WACC staff member or contracted personnel or project partners to the appropriate staff member.

Reporting

WACC will ensure that confidential, safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff, contracted personnel, partner organizations, and the communities we work with.

Any staff reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected by WACC's Working Practices Policy (which includes whistleblowing and malpractice).

How to report a safeguarding concern

Those who have a complaint or concern relating to safeguarding should report it immediately to the General Secretary or Deputy General Secretary or Programme Manager.

Concerns can be expressed in writing via email or by post:

wacc@waccglobal.org

World Association for Christian Communication
308 Main Street
Toronto, ON, CANADA
M4C 4X7

If a person does not feel comfortable reporting to any of these (for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they may report to the WACC President at President@waccglobal.org.

WACC will follow up on reports of safeguarding concerns promptly and according to due process. WACC will ensure that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need to know basis only, and should be kept secure at all times. Concerns can also be addressed through a trusted intermediary to maintain anonymity.

Response

WACC will follow up safeguarding reports and concerns according to policy and procedure, and legal and statutory obligations according to the WACC Working Practices Policy.

The complainant will be notified of receipt of their complaint, where possible, within 2 business days of receipt of the complaint by phone or email. The following information will be provided to the complainant:

- Confirmation of receipt of the complaint
- How WACC plans to address the complaint (the process)
- Name of the person handling the complaint
- Name of the person and how to contact regarding questions.

WACC will advise of the preliminary outcome of an investigation within 10 days (where possible).

Complainants will be apprised of timeframes of the investigative report.

WACC will apply appropriate disciplinary measures to staff or contracted personnel alleged to be or found to be in breach of the Code of Conduct. Where a breach of the Code of Conduct is outside the jurisdiction of WACC, discipline will be subject to relevant local legislation.

Adherence to Code of Conduct

All staff are required to review and sign this Code of Conduct. It automatically forms part of all contracts of employment.

This Code of Conduct also forms part of contracts with consultants and contractors. **All contracted personnel and partner organizations are aware of the Code of Conduct and adhere to its principles.**

Relevant policies

This WACC Code of Conduct Relating to Safeguarding / Sexual Exploitation and Abuse is supported and complemented by the following *internal* policies:

Child Protection Policy
Equal Opportunities Policy
Gender Justice Policy
Grievance Resolution Policy
Health and Safety Policy
Working Practices Policy

Other policies as appropriate

Glossary of Terms

Contracted personnel

People engaged with work or visits officially related to WACC, including but not limited to the following: officers and board members; consultants; volunteers; contractors; any person representing WACC in an official capacity.

At risk adult

Sometimes also referred to as vulnerable adult. A person who is or may be in need of care 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.

Beneficiary of Assistance

Someone who directly receives goods or services from WACC's programme. Note that misuse of power can also apply to the wider community that the NGO serves, and also can include exploitation by giving the perception of being in a position of power.

Child

A person below the age of 18.

Harm

Psychological, physical and any other infringement of an individual's rights.

Partner Organization

A partner organization is one where WACC has entered into a contractual obligation that may or may not include financial support, but which does involve direct contact with beneficiaries of assistance.

Psychological harm

Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation.

Protection from Sexual Exploitation and Abuse (PSEA)

The term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by staff or contracted personnel. The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13).

Safeguarding

Safeguarding means protecting people's health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect.² WACC understands it to mean protecting people, including children and at risk adults, from harm that arises from coming into contact with our staff or programmes. This means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and

² NHS 'What is Safeguarding? Easy Read' 2011

harassment from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur.

Safeguarding applies consistently and without exception across WACC's programmes, partners and staff. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialise. Those systems must be survivor-centred and also protect those accused until proven guilty.

Safeguarding puts beneficiaries and affected persons at the centre of all we do.

Sexual abuse

The term 'sexual abuse' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual exploitation

The term 'sexual exploitation' means any 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. This definition includes human trafficking and modern slavery.

Survivor

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