

How-to note



How to develop your organisational safeguarding policy

For civil society organisations (CSOs)

This how-to note outlines what a safeguarding policy is, why it is important for civil society organisations (CSOs) and how CSOs can develop or update their safeguarding policy.

For the Resource and Support Hub (RSH), safeguarding from Sexual Exploitation, Abuse and Sexual Harassment (SEAH) means taking all reasonable steps to prevent SEAH from occurring, to protect people from that harm, and to respond appropriately when harm does occur. Generally, however, safeguarding covers protection from SEAH plus other forms of harm, like bullying and harassment.

Definitions

Read definitions on the [‘What is safeguarding’ page](#) of the RSH website.

Explore the [PSEA glossary](#) for related terms and definitions in over 30 languages.

Before we start!

If a CSO does not have a safeguarding policy in place, this does not mean that it does not have any safeguarding expertise or understanding. It is likely that many CSOs have skills, knowledge and expertise to help protect their staff and the people they interact with from SEAH, and other forms of harm in their context. [Click here](#) to see how and where policies and procedures fit in the safeguarding journey.

What is a safeguarding policy?

A safeguarding policy is a written document that explains your organisation’s commitment and approach to keeping staff, associated personnel and the people you come into contact with, including programme participants (e.g. communities, affected people, etc.), safe from SEAH and from other forms of harm, like bullying, harassment and discrimination.

A safeguarding policy is usually accompanied by a code of conduct and a range of procedures or instructions which are necessary to apply the policy. [Click here](#) for a short note on how to develop or update your code of conduct.

We have used the term ‘Safeguarding policy’ in this how-to note for ease. However, safeguarding can also be adequately covered in a policy with a different title or in a combination of policies, for example Protection from Sexual Exploitation, Abuse and Sexual Harassment (PSEAH) policy, plus Bullying and Harassment policy.

Organisations sometimes develop a **Safeguarding Policy Framework** which identifies all the different policies that are relevant. This helps bring the different policies together for users. The

range of related policies can include, but are not limited to: Anti-Discrimination policy, Gender policy, Child safeguarding policy, Youth safeguarding policy, Human Resources policy, Employee handbook/ manual, Anti-Bullying policy, Information Technology policy, Protection from SEA (PSEA) policy, Whistleblowing policy, Data Protection policy, People and Culture policy or Survivor policy.

Aligning your policies

Each CSO will decide how to organise the different types of harm and abuse and where to place them in their policies. For example, regarding protection from SEAH (PSEAH) and other harms, a CSO may have one policy for community members and programme participants, and a separate policy for staff and associated personnel. Another CSO may have a child safeguarding policy for children and a PSEAH policy for adults including staff, associated personnel and community members that the organisation interacts with. Lastly, another organisation may include SEAH and all harms and abuses caused by the organisation to all people in one policy.

The main point is to ensure that the different policies refer to each other, are aligned and between them cover (1) all the different forms of harm and abuse* and (2) all different individuals that the organisation interacts with (any contracted staff member or volunteer, and community members including children and others who may not be programme participants).

* Sexual exploitation, sexual abuse, sexual harassment, bullying, harassment and discrimination. For definitions see the offline version of the RSH e-learning module 1, p.6.

Why is a safeguarding policy important?

1. Everyone who interacts with your organisation has the right to be protected from harm and abuse that may be caused by your staff, associated staff, your organisation's operations and/or programmes. A policy can show your commitment to their protection.
2. A policy can formalise or embed existing commitments and ways of working that are already protecting staff, associated personnel and community members from harm and abuse.
3. Your organisation will have some legal obligations regarding not harming staff or others in the workplace.
4. Donors and funding partners expect organisations to take all reasonable measures and steps to safeguard the people who work for them and who they come into contact with. Developing a policy which outlines an organisation's approach to safeguarding is one common requirement of donors and funding partners. (See point 6 below for more detail).

Explainer: Associated staff

Associated staff (employees or personnel) include people who are not staff members but work for, have an agreement with or represent your organisation. For example, consultants, contractors, volunteers, trustees, drivers, cleaners, interpreters, interns etc.

Can we just take a safeguarding policy from another organisation?

Where CSOs don't have their own safeguarding policy, they often use the relevant policy of a funding partner or other organisation. While this is a practical short-term approach, for the long term it is more effective for CSOs to develop or adapt a safeguarding policy with content that is appropriate for their specific organisation, context and intended users. A policy which uses inappropriate terminology, the wrong language(s) and doesn't reflect the specific dynamics of a context or organisation will not be understood or used and may cause more harm. [Click here](#) to see some policy templates.

Safeguarding policy development process in 10 steps!

The process of developing or updating a safeguarding policy is just as important as having a safeguarding policy. The process can help build buy-in and understanding, as well as ensure relevance across the organisation. The following steps can help you develop or update your organisation's safeguarding policy:

1. Agree who should be involved in the policy development process and set a timeline

- Executive Directors or the leading people of a CSO are responsible for defining and leading the policy development process.
- The process should also include input from staff and associated staff across the organisation. It will be valuable to gather diverse input from across the organisation, e.g. gender, race, seniority or disability. Staff working in Human Resources (HR), Communications, Programmes and Information Technology (IT) may be particularly important to include.
- Agree a policy development timeline.

2. Define your organisation's broad commitment to safeguarding

- Make sure that all participants involved in the policy development process understand that power imbalance is the root cause of all safeguarding issues. [Click here](#) for a group exercise called the Power Walk that can help visualise the concepts in question and initiate discussions.
- [Click here](#) for an infographic on the root causes of SEAH. For more on intersectional risk and safeguarding, read this [RSH tip sheet](#).
- With this understanding, agree your broad organisational commitments to safeguarding. For example: *X organisation commits to protecting staff, associated staff and all people who interact with our organisation from SEAH and other forms of harm that are caused by our staff, associated staff, operations or programmes.*

3. Gather existing relevant organisational documentation and information

Many CSOs will already have some relevant policies, ways of working or procedures (formal/informal, written/unwritten etc.) in place to protect their staff and the people they interact with from SEAH and other harms. Use the below broad questions to guide your information gathering (you can also refer to the [RSH Nigeria risk management guide](#) for more questions):

- Do leaders and staff acknowledge that there is a power imbalance between staff members, and / or between staff and different community members, which could lead to abuse and could be used to enable abuse in other ways, like silencing people who may have something to report or preparing someone for abuse within a community?
- Do your organisational values refer to generating a safe, equitable and inclusive organisation?
- Does your organisation conduct checks on potential employees before they are hired to make sure they don't pose an unacceptable risk to staff or programme participants?
- Does your existing work recognise that certain individuals might be at higher risk of abuse and that they may need additional protection and support? For example, children, persons with disabilities, women, or LGBTIQ+ persons.
- Do staff know how they are expected to behave and what will happen to them if they behave in an inappropriate way?
- How do you make sure that staff and associated staff will not cause harm to other staff or anyone who the organisation interacts with?
- Are there different ways for programme participants, community members and staff to report abuse or a suspicion of abuse caused by your organisation?
- How do you respond to suspicions or reports of abuse that have been caused by your organisation's staff, associated staff, programmes or operations?
- Are there ways for programme participants and other community members to share with you if they feel safe or not safe in a programme activity or engaging with certain staff etc.?
- Do your programme activities and communications consider and manage if and how harm may be caused to programme participants and other community members?
- Is some staff time or budget already allocated to protection from harms and abuses?

4. Map information on relevant laws and their application for your location

- What are the employment laws in your country?
- Are there any restrictions to terminating a contract? Is SEAH or other forms of harm a legally approved reason for terminating a contract in your country?
- What legal responsibilities do CSOs in your country have to staff, associated staff and all people you come into contact with?
- What laws protect adults from SEAH and other forms of harm, like bullying, harassment, discrimination?
- What laws protect children from SEAH and other forms of harm, including physical abuse, verbal or emotional abuse, and neglect?
- What laws or statutes are related to age of consent and marriage?
- What laws, statutes or rules are related to mandatory reporting?
- What laws or statutes are related to Gender-Based Violence?
- What data protection and privacy laws are in place?
- What digital protection laws are in place?
- Are the laws in place well enforced? Can the laws be easily exploited?
- Are people who are custodians of the law sometimes perpetrators of abuse themselves?

Example from South Sudan

In South Sudan access to justice for human rights violations is extremely limited. The community, as well as survivors, sometimes prefer to be forcefully married by the perpetrators as it is seen as the only solution available. If an employer terminates staff, they are obliged to pay that staff at least 6 months' salary.

5. Map how other contextual factors may contribute and respond to the different harms and abuses

- What factors make people less safe and offenders more daring? For example, not having confidential reporting channels, cultures that promote fines or forceful marriage (for the survivor) after sexual offences.
- What measures are already in place to prevent and respond to harm in the community?
- What are common attitudes towards violence against, exploitation and abuse of women, elderly, children, certain ethnic groups and LGBTQI groups in the areas in which you work?
- Who is included in society and who has power in communities and in societies?
- What is the poverty level and access to basic services?
- Does religion play a role in protecting people from abuse or contributing to the abuse?
- What kind of setting is the organisation based in? E.g. urban, rural.
- What is the security situation in the location?
- Is there a community structure or leadership in place (or evolving) that responds to incidents of abuse? Are the structures used and trusted? By whom?
- Has there been a recent event or is there a current trend which may have a positive or negative effect on the way people respond to SEAH and safeguarding policies and procedures?

Example from South Sudan

In very insecure and remote locations, medical, psychosocial, and legal services do not exist and organisations are unable to provide appropriate support to survivors.

There is a different understanding of SEAH - what is presented in the global standards is different to perceptions, behaviour and beliefs in South Sudan. In South Sudanese culture, there is no age of consent. A man is entitled to marry a 10-year-old girl without consulting her or the parents. Poverty is a contributor as her family will benefit from dowry paid. The greetings in South Sudan especially between males and females can be easily interpreted as Sexual Harassment (for definitions see the offline version of the RSH e-learning module 1, p6).

6. Revisit the global standards on SEAH

There are global standards on SEAH which can guide your safeguarding policy content and procedures. [Click here](#) to read a Summary Brief on the content of the different standards and [click here](#) to read a how-to note on how to apply the global standards on SEAH. The how-to note outlines safeguarding good practices under the following headings: policy framework, prevention, response and reporting. Many donors will expect to see evidence that these global standards are adhered to as part of their due diligence.

7. Analyse the strengths, weaknesses, opportunities and threats for developing a safe organisation (SWOT analysis)

Discuss the strengths (S), weaknesses (W), opportunities (O) and threats (T) relating to making a safe organisation for staff and anyone your organisation comes into contact with. Comprehensive discussions on strengths, weaknesses, opportunities and threats should:

- Use information on current ways of working, context, and global standards
- Be structured around policy framework, prevention, response and reporting
- Include staff experiences

[Click here](#) for a guide on how to carry out a SWOT analysis for your safeguarding policy.

Once you have discussed all of the strengths, weaknesses, opportunities and threats, discuss ways to minimise the weaknesses and threats and to maximise the strengths and opportunities and set priorities. The ideas and priorities that emerge can be used as the basis for the policy and related procedures.

Tip

This exercise may provide you with a lot of detailed information. You do not have to use all of it in your policy. Much of the detailed information can be used for procedures and applying the policy.

8. Agree where and how safeguarding will fit across your organisational policies

Decide:

- What policy or combination of policies will most appropriately cover SEAH and other forms of harm for your organisation.
- What new policies need to be developed, e.g. safeguarding policy or PSEA policy.
- What existing policies need to be updated based on the above process, e.g. HR policy, IT policy.

9. Write or update the policy

Use the content gathered throughout the process to draft the policy. Input from staff, notably the policy development team, is important before finalising the document. Refer to the points below as you are writing. The content of your safeguarding policy should:

- Apply to all staff and associated staff 24 hours a day.
- Explain why your organisation is committed to keeping staff and the people you come into contact with safe from Sexual Exploitation, Abuse and Sexual Harassment (SEAH) and from other forms of harm, like bullying, harassment and discrimination.
- Explain how your organisation supports diversity and contests inequality.
- Explain the principles upon which you will base your decision making and action on safeguarding procedures, including your expectations of all your staff and associated staff.
- Consider the wellbeing of victims/survivors and of all staff and associated staff
- Define SEAH and other forms of harm and clarify them with relevant, local examples.

- Outline broadly how your organisation will prevent and respond to SEAH and other forms of harm caused by staff, associated staff or the organisation's operations or programmes. As part of this, it may note the importance of identifying and managing risks.
- Outline disciplinary actions for abuse and harm caused by staff and associated staff.
- Explain the roles and responsibilities of different staff members and board of trustees.
- Outline relevant resources (e.g. staff time) and budget that will be allocated to the application of the policy.
- Be accompanied by an organisational **code of conduct** and a range of procedures (for the range of necessary safeguarding procedures you may need, visit the “What is needed” section of the **safeguarding journey**).
- Include reporting channels and contacts that are secure and confidential.
- Have an annexed safeguarding code of conduct that will be signed by staff and associated staff.

10. Create accessible versions of the policy and share it widely

- Translate the policy into relevant languages using appropriate terminology for each language. **Click here** to access a multi-language PSEA glossary.
- Ensure easy read and other accessibility features are in place for staff with disabilities.
- If the policy is too long or is not user-friendly for all staff and associated staff, consider creating visual versions, summaries or pocket cards of the policy.
- Share the final versions of different, appropriate formats with all staff and associated staff in different ways and regularly remind people of its importance.

Lastly! Monitor the application of the policy

Once the policy is developed, it is important to monitor if it is used, who uses it, how people use it, what works well and what does not work. It is customary to update policies and make adjustments after one or two years to ensure that they remain relevant. For a completely new policy, it would be valuable to review its use after 6 months and adapt if needed.

We referred to the below resources when developing this tip sheet

NSPCC, (2022) **Writing safeguarding policies and procedures**

Catholic Relief Services (CRS), (2020) **Safeguarding and PSEA Toolkit**, Part I

Keeping Children Safe (KCS), (2018) **Developing Child Safeguarding Policy and Procedures**

CHS Alliance (2020) **PSEAH Implementation Quick Reference Handbook**

References

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