

Keeping People Safe policy - Manas

INTRODUCTION

Manas approach to keeping people safe is guided by our vision, mission and values. Our vision is to enhance how organisations and teams approach and confront mass violence through nurturing recovery and bolstering resilience across the globe. We believe in Social Justice, Trauma-informed practices, Inclusion, and Integrity. We work to create a world allowing all individuals to flourish, free from violence, and with equitable access to opportunities for restoration. And our mission is champion global justice and healing in the aftermath of collective violence, through our commitment to trauma-informed practices and a focus on healing-centred solutions.

Consistent with our vision, mission and values, we are committed to providing a safe environment for all those with whom we work and interact. The guiding principle of our policy on keeping people safe is that we believe that it is always unacceptable for children, young people or adults to experience any kind of abuse. We have a particular responsibility to ensure that the most vulnerable, children and at-risk adults, are protected. *Manas* will also not tolerate abuse and exploitation of its staff, consultants, and partners by those we employ (in whatever capacity). *Manas* has a zero-tolerance approach to sexual abuse and exploitation.

We believe in keeping people safe. We believe that protecting children and at-risk adults is the responsibility of everyone engaged in *Manas*' work. The welfare of these individuals is paramount. All people have the right to protection from abuse regardless of age, gender, race, ethnicity, disability, sexual orientation, belief, gender, marital status or sex (See **Section 3 Code of Conduct**).

This policy explains who must be kept safe, who has a responsibility to keep people safe, and how we keep people safe in practice including recruitment, training, reporting and governance.

OUR PRINCIPLES:

The principles in this policy have been drawn from key international and regional instruments such as: *International Standards for Keeping Children Safe* and the *UN Convention on the Rights of the Child*.

Manas is committed to engaging with the international NGO community, contributing to and aligning with best practice in this area. For the removal of doubt these principles apply to all persons who come into contact with *Manas*' work. These individuals will be referred to as "associated individuals".

Our principles are:

- All children and at-risk adults have equal rights to be kept safe from harm.
- Everybody has a responsibility to support the protection of children and at-risk adults.
- Organisations have a duty of care to children and at-risk adults with whom they work, are in contact with, or who are affected by their work and operations.
- Organisations have a responsibility to help partners meet the minimum requirements on protection.
- All actions in relation to keeping children safe are taken in the best interests of the child.
- All actions in relation to keeping at-risk adults safe are taken in the best interests of the at-risk adults.

MANAS APPROACH

Our safeguarding approach is grounded in the trauma-informed and survivor-centric approach we advocate across our projects and we apply within our own organisational culture. We are, therefore, committed to adhere to the best principles in the field such as the following documents:

- IASC-MHPSS guidelines for intervention in emergency settings (2007) and the *Recommendations for ethical research in MHPSS* (2013)¹
- WHO (2007) *Ethical and Safety recommendations for researching, documenting, and monitoring sexual violence in emergencies*²
- SAMHSA principles (2018)³
- The PSVI[Preventing Sexual Violence Initiative] *International Protocol of investigation and documentation of sexual violence in conflict*, (2017; 2014)⁴.
- The *Murad code* (2022)⁵

1. Definitions and Scope

Definitions

- Children: All children under 18 years of age as defined by the UN Convention on the Rights of the Child irrespective of the laws and customs in country.
- At-risk Adult: Any adult over 18 years of age could be at risk of harm and in need of being kept safe, including by reason of mental or other disability, age, illness and/or who lives with economic dependence, a conflict environment or cultural constraints.
- Associated individuals: individuals who come into contact with *Manas*, or its partner organisations, in the course of the work of *Manas*.

Scope: Who is governed by this policy?

This policy applies to all *Manas* representatives including staff (whatever their employment status), Consultants, volunteers, contractors, and trustees. *Manas* works with clients such as organisations, CSOs, government and UN bodies, and partners in country. This policy will be cascaded to all partners who will be expected to meet the standards set out in this policy.

2. Abuse and exploitation

Abuse and exploitation of children and vulnerable adults can take many forms and includes:

- Physical abuse is the actual or likely physical injury or the failure to prevent it.
- Emotional abuse is the actual or likely adverse effect of threatened abuse.

¹IASC-MHPSS. (2013) Recommendations for ethical MHPSS research.

https://interagencystandingcommittee.org/system/files/1_iasc_recommendations_for_ethical_mhpss_research_in_emergency_settings_0.pdf

² WHO (2007) *Ethical and safety recommendations for researching, documenting and monitoring sexual violence in emergencies*. Geneva, World Health Organization, 2007

³ SAMHSA[Substance Abuse and Mental Health Services Administration] (2014) *SAMHSA's Concept of Trauma and Guidance for a Trauma-Informed Approach*, HHS Publication No. (SMA) 14-4884, Rockville, Maryland: Substance Abuse and Mental Health Services Administration.

⁴ PSVI (2017). *International Protocol of investigation and documentation of sexual violence in conflict*, Second edition (2017)

⁵ The *Murad Code* (2022) <https://www.muradcode.com>

- Sexual abuse and exploitation including rape, all forms of sexual activity, exchange of benefits (including food and money) for sexual favours.
- Neglect, where basic needs such as food, warmth and medical care are not met, including lack of supervision.
- Commercial exploitation, including child trafficking.
- Sexual harassment is unwanted conduct of a sexual nature. The effect of sexual harassment is to violate the dignity of another person and to create an intimidating environment for them.
- Online abuse, including grooming.
- Discrimination
- An abuse of a position of trust by charity trustees, workers, partners or volunteers

3. Code of conduct

Manas shall be known for its professionalism and high ethical standards. This Code of Conduct is intended to serve as an ethical platform and formal commitment to hold anyone undertaking work for and representing *Manas* accountable for their actions and behaviour. All *Manas* representatives must follow the Code of Conduct at all times and both inside and outside the workplace (i.e. in the field or when working with partner organisation and clients).

For clarity, *Manas* representatives shall uphold the following values and behaviours:

RESPECT AND DIGNITY

- Respect all persons equally and without any distinction or discrimination based on nationality, race, ethnicity, tribe, gender, religious beliefs, political opinion or disability.
- Keep themselves informed about *Manas*' mandate, policies, objectives and activities.
- Respect local laws, customs and habits of the local culture. I will act in a manner that ensures that the best interests of the most vulnerable, especially women, children, displaced people and vulnerable minority groups.

PERSONAL AND PROFESSIONAL CONDUCT

- Uphold the integrity of *Manas* and their personal and professional performance will always be based on a non-racist, non-discriminatory and gender sensitive conduct.
- Not engage in any exploitative relationships – sexual, emotional, financial or employment related – with IDPs, refugees, staff members or other persons.
- Be patient, respectful and courteous to all persons with whom I deal including colleagues, beneficiaries, local leaders and government representatives, representatives of operational and implementing partners, donors and other NGO and UN colleagues.
- Dress in a manner appropriate to the assignment and the cultural setting.
- Act in conformity with *Manas*' instructions and policies, as well as their professional regulatory bodies when this applies.

CONFLICT OF INTEREST

- Perform my official duties and conduct my private affairs in a manner that avoids conflict of interest.
- Respect the mandate, objectives and values of *Manas* and ensure that personal views, behaviour and beliefs, including political and religious convictions, do not adversely affect official duties or activities performed on behalf of *Manas*.
- Not receive or provide bribes, including 'give backs' (as pay or commissions) of any kind.

FINANCIAL AND MATERIAL RESOURCES

- Safeguard and make responsible use of the information and resources to which I have access by reason of my engagement with *Manas*.
- Handle *Manas*' financial and material resources with the utmost care, safeguard these at all times against theft or other damage, keep and maintain them properly, and ensure that unauthorized and unethical use of *Manas* funds or private misuse does not occur.
- Conduct all official duties with integrity, free from any taint of dishonesty or corruption, including not engaging in any act of favouritism, nepotism or bribery. This includes not accepting from any external source (including National Societies, governments, corporations or others) without clarification or authorisation, any honour, decoration, gift, remuneration, favour or economic benefit which is more than a "token gift".
- Divulge any confidential information about any litigation or other legal work undertaken by *Manas*, sensitive information relating to beneficiaries or colleagues, or any other work-related matters.

MEDIA, INFORMATION AND IT

- Ensure that portrayal of individuals and their circumstances is fairly represented in terms of their capacities and vulnerabilities. All efforts must be made to explain how photos and stories will be used and to obtain permission from the individuals for the use of their photos and stories.
- Refrain from making comments to the media or to journalists on behalf of *Manas* without prior agreement with the Executive Director.
- Committed to, both while working with/for and after leaving *Manas*, not to reveal any confidential information obtained while working with/for *Manas* to any third party.

CRIMINAL AND UNETHICAL ACTIVITIES

- Have no involvement in criminal and unethical activities, activities that contravene human rights, or activities that compromise the image and interest of *Manas*.

SAFETY, HEALTH AND WELFARE

- Remain aware of and comply with instructions designed to protect my health, welfare and safety.
- Follow the set safety and security regulations/procedures for the area of operation, including the organisation partnered with under which the professional may operate.

PROHIBITION AGAINST SEXUAL EXPLOITATION AND ABUSE (See also Section 3 of this document)

Sexual exploitation and sexual abuse violate universally recognised international human rights standards. Sexual relationships between *Manas* personnel and beneficiaries of assistance undermine the credibility and integrity of the work of *Manas* and are prohibited.

Manas commits to treating everyone with respect, recognising their right to personal privacy. Thus, all *Manas* representatives will:

- Plan, organise and implement events in a manner which reduces such risk;
- Foster a culture of mutual accountability so that potentially abusive behaviour can be challenged;

And shall not:

- Engage in physical/sexual relationships with participants regardless of the age of consent since they are based in inherently unequal power dynamics (the mistaken age of a child or vulnerability of a person is not a defence);
- Behave physically in a way which is inappropriate or sexually provocative;
- Develop inappropriate relationships or use behaviour with children or at-risk adults, which could in any way be deemed exploitative or abusive;
- Place themselves in a position where they could be accused of sexually abusing a child, young person or at-risk adult;
- Spend excessive time alone with children or at-risk adults, away from others, in a secluded area or behind closed doors, or where they cannot be seen and/or heard by at least one other adult who is not at-risk.
- Take children alone in a car unless it is absolutely necessary and with parental or guardian consent;
- Act in ways that may be abusive or may place a child or at-risk adult at risk of abuse;
- Use language, make suggestions or offer advice which is inappropriate, offensive or abusive;
- Offer benefits such as food, favours, clothes, jobs, money in exchange for sexual favours;
- Show favouritism to any individual for sexual favours in return; and
- Act in ways intended to shame, humiliate, belittle or degrade individuals including children or at-risk adults, or otherwise perpetrate any form of emotional abuse.
- Engage in any commercially exploitative activities with children including child labour or trafficking.
- Hit or otherwise physically assault or physically abuse anyone.

3. Sexual Exploitation, Abuse and Harassment [SEAH]

Company commitment

Manas believes that everyone we come into contact with, regardless of age, sex, disability, sexual orientation, religion, or ethnic origin has the right to be protected from all forms of harm, abuse, neglect, and exploitation. The Company will not tolerate abuse and exploitation by Representatives or consultants. We commit to address SEAH throughout our work, in a way that is aligned with the United Nations Inter-Agency Standing Committee (IASC) summary of good practice in *Preventing Sexual Exploitation and Abuse and Sexual Harassment and Abuse of Aid Workers* published 31 May 2018.

Additional reference documentation includes: *CHS Alliance PSEA Handbook* (2017) and IASC *Global Review of Protection from SEA* (2010)

Prevention of Sexual Exploitation, Abuse and Harassment [SEAH] risks

Company responsibilities

Manas representatives are required to consider SEAH risks and develop plans to manage them within projects as part of a comprehensive approach to Safeguarding.

The Company:

- Ensures all Representatives are familiar with and know their responsibilities.
- Designs and undertakes all its projects and activities in a way that protects people from the risk of harm that may arise from their interactions with *Manas*.

- Implements stringent Safeguarding procedures when recruiting, managing, and deploying Representatives.
- Ensures all Representatives are up to date with their training on Safeguarding at a level commensurate with their role in the organisation.
- Follows up on reports of Safeguarding concerns promptly and according to due process.

Representative responsibilities

Representatives must not:

- Exchange money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. This includes exchange of assistance that is due to beneficiaries of assistance.
- Engage in sexual activity with Children. Mistaken belief regarding the age of a person is not a defence.

Additionally, Representatives must commit to:

- Contributing to creating and maintaining an environment that prevents Safeguarding violations and promotes the implementation of the Safeguarding Policy.
- Reporting any concerns or suspicions regarding Safeguarding violations by a Representative.

In addition:

- Sexual relationships between Representatives and beneficiaries are strongly discouraged since they may be based on inherently unequal power dynamics. Where this becomes an issue for a Representative, it should be discussed with *Manas* Director(s).

5. Safe recruitment, induction, and training

Manas is committed to uphold the highest standards of practice to protect the integrity of all in all circumstances, in their personal and professional conduct. Safeguarding and ‘do-no-harm’ approach are, therefore, our highest priority.

We shall operate safe recruitment and management practices, by:

- Ensuring all clinical members in *Manas* have an active registration in their professional regulatory body and operate as well under its code of conduct: Health and Care Professions Council [HCPC] (UK), Royal College of Psychiatrists [RCPsych] (UK), Royal Australian & New Zealand College of Psychiatrists [RANZCP] (Australia), L’Ordre National des Médecins (France).
- Implementing a recruitment and management process which ensures due diligence checks are completed if they have not been completed through the professional body. In the UK, this would involve an enhanced DBS check.
- Ensuring all members and consultants read and acknowledge the Code of Conduct, Keeping people safe and other associated policies, including in the Consultant’s handbook of *Manas*. This will be mentioned in the job description/terms of reference and consultancy agreement for consultants that will include the responsibilities for keeping people safe commensurate with the role.
- Committing that all staff, volunteers, consultants, and trustees will keep up to date with CPD and trainings related to Safeguarding that is consistent with their job roles.

Creating an 'aware culture' in which the entire team contribute to both the protection of children and at-risk adults and prevention of abuse and exploitation is crucial for *Manas*.

6. Communications

Manas is committed to respecting the privacy and rights of all those we work with. We will only publish stories, text and images, still or moving, of children or at-risk adults if written informed prior consent has been received from either the child or at-risk adult or their parent or guardian. Where a child is under 16 years old, prior written informed consent must be provided by their parent or guardian.

7. How to raise a concern about safety or harm

Manas publishes its Policy on keeping people safe, and other policies on its website.

The Incident Reporting Form can be found in Appendix 1 although you do not need to use this form to raise a concern; you can speak to any members of the team. The guiding principle in responding to any concerns around harm is that the safety and welfare of the child or at-risk adult should always come first. No one should be put at more risk by any action that may be taken. If you have a concern, you should report it as soon as it is practicable and safe to do so. An allegation of abuse of a child or at-risk adult should be taken seriously at all times. It is not for you to decide whether or not abuse or exploitation has taken place but to raise your concerns and/or pass on any concerns which have been raised with you. You can do this verbally or in writing. You do not have to decide whether or not there has been abuse.

The need to report arises in the following instances:

- You observe or suspect abuse.
- You hear or receive an allegation of abuse.
- A child or vulnerable adult discloses abuse.

Disclosures and suspicions should always be investigated and acted upon swiftly making the welfare of the individual paramount. Any delay must be avoided. Information given should be written in a report as soon as possible after the concern was raised (within 24 hours if possible). Any written records taken must be kept securely in a locked place. Under no circumstances should any individual attempt to deal with the problem of abuse alone.

It is essential that all parties maintain confidentiality and therefore sharing of information, which could identify a victim or an alleged perpetrator should be purely on a 'need to know' basis. Unless abuse has actually been proved to have occurred one must always refer to 'alleged abuse'. Names and identities are not to be disclosed outside the group designated as 'need to know'. *Manas* may be under a legal obligation to report anonymised incidents to certain authorities.

8. Investigating a concern

Manas will keep an incident log of concerns raised, in which all reports will be kept confidentially and securely. At the point at which the actual or alleged incident is reported, *Manas* will report the incident to the relevant and necessary authorities in order to comply with its obligations in the jurisdiction in which the incident occurs, if not the UK.

Manas recognises the importance of a timely response to any concerns raised, while acknowledging that investigations can be challenging processes and that it is important not to do further harm by rushing an investigation process. Any ongoing investigations will be treated as a top priority by those managing, and those advising on, the investigation until the investigation is concluded.

Manas will apply appropriate disciplinary measures to staff found in breach of policy. *Manas* will apply appropriate disciplinary measures to staff found in breach of policy. *Manas* will endeavour to ensure that support is accessed by victims and survivors.

Key contacts

Please let us know if you have any questions or concerns about this Policy or about the way in which we process your personal information by contacting us at the following channels:

Email: info@manas.org.uk

Post:

Manas International Consulting Ltd
5 Brayford Square
London
E1 0SG

Review

Manas is committed to reviewing its policy and good practice in six months from the date of implementation and with annual reviews thereafter.

This policy was last reviewed on: **10th May 2024**

Annex 1: Reporting form - *Manas*

Note: Please remember that all information contained in this report must be kept confidential and must not be revealed to anyone except the person you reported to. You will be informed of next actions that will be taken.

Part One: About You

Name:

Your role in (*Manas* or other):

Details of any other organisation involved:

Your relationship to the child or vulnerable adult concerned:

Part Two: About the Child/Vulnerable Adult

Name(s):

Male/female:

Age:

Address:

Whom does the person live with?

Part Three: About Your Concern

How did you come to have a concern: was abuse or policy non-compliance observed or suspected? Was an allegation made? Did a child, young person or vulnerable adult disclose abuse?

Date, time and place of any incident(s) reported to you:

Nature of concern/allegation:

Observations made by you (e.g. individual's emotional state, any physical evidence)

Write down exactly what the child or person making a report said and what you said (or another informant said): continue on a separate sheet of paper if necessary.

Any other relevant information? (E.g. disability? language?)

Were other people involved or aware?

Have you already spoken to parents or carers or any other Safeguarding Personnel or Agencies? Yes or No ____

If Yes, who or whom?

Time and date of reporting:

Person(s) to who report was made: (name of supervisor/manager/staff):

Advice given by that person or agency:

Action Taken:

I understand that in making this report *Manas* may have to inform authorities, in a confidential manner and only if necessary for the safety of the child, at-risk adult, the staff member, the partner, or to meet obligations to donors or under national law.

Signed:

Date: