



Safeguarding framework

Promoting Equalities Regional Programme

April 2024

Table of Contents

Policy Review Controls	3
Acronyms	4
1. Background and rationale	5
1.1. Safeguarding in the Promoting Equalities Regional Programme	5
1.1.1. Why is it important to embed safeguarding in the three areas of work?	6
1.2. Objectives of the framework	6
1.3. Defining safeguarding	7
1.3.1. The harms we are safeguarding from	7
1.3.2. Who we are safeguarding	10
1.4. Who the framework applies to	11
1.5. PEP-R Safeguarding Principles	11
2. Procedures for PEP-R partners and activities	12
2.1. Due diligence of partners and staff	12
2.2. Policy and Code of Conduct	13
2.3. Complaint mechanism	14
2.4. Safeguarding focal point	14
2.5. Risk Management	15
2.6. Integrate safeguarding through the project cycle	16
2.7. Training of staff and associates and awareness raising	16
2.8. Safe Communications	17
2.9. Research ethics and safe MEL procedures	19
2.9.1. Research ethics	19
2.9.2. Safe monitoring and evaluation and research	19
2.10. Monitoring awareness and compliance	19
2.11. Staff care and wellbeing	20
3. Responding to safeguarding concerns	21
3.1. Reporting and receiving a safeguarding concern	21

3.2. Identifying a safeguarding concern	21
3.3. Reporting to local authorities.....	23
3.4. Case handling.....	23
3.5. Confidentiality and information sharing.....	24
4. Roles and responsibilities	25

Policy Review Controls

Policy details	
Name	Safeguarding framework
Owner of Framework	Maria Vlahakis
Date approved	April 2024
Frequency of Review	Every year
Key related documents	MEL Framework (to come) PEP-R Community Guidelines

Version control		
Version Number	Summary of key changes	Date of Approval

Acronyms

A&I	Accessibility and Inclusion
FCDO	UK Foreign, Commonwealth and Development Office
LGBT+	Lesbian, Gay, Bisexual, Transgender, Plus
SDDirect	Social Development Direct
SEAH	Sexual Exploitation, Abuse and Sexual Harassment
PSEAH	Protection from Sexual Exploitation, Abuse and Sexual Harassment
PEP-R	Promoting Equalities Regional Programme
RGEA	Regional Gender and Equalities Adviser

1. Background and rationale

1.1. Safeguarding in the Promoting Equalities Regional Programme

The aim of the four-year (2023-2027) FCDO-funded Promoting Equalities Regional Programme (PEP-R) is to strengthen capabilities and capacity building efforts on gender and equalities. The programme seeks to engage both internally across FCDO and externally with key stakeholders. The intention is that this will help **UK FCDO Posts and partners** to better deliver for women, girls, and marginalised groups, including LGBT+ communities and people with disabilities. Due to the explicit focus that PEP-R has on equalities and marginalised populations, and the knowledge that marginalised groups are often at higher risk of discrimination and harm, safeguarding and safe delivery is considered integral to the programme's success.

The programme is managed by the Gender and Equalities Department at FCDO. The design and implementation of PEP-R is led by consortium partners in partnership with FCDO. Read section 1.4 for more information on the different partners. The programme covers three core areas of work:

An **Equalities Enabling Fund**, which will be accessible to FCDO Posts to support context-specific, agile, and small catalytic initiatives to strengthen FCDO's capabilities and take forward strategic priorities on gender and equalities. Fund projects are delivered by Posts working with a range of different implementing partners around the world.

An **Equalities Resource Hub**, a website for FCDO-funded resources on gender and equalities, as well as intended to be a global public good. The website will focus on sharing FCDO evidence and expertise externally and showcasing what areas of knowledge and thought leadership the FCDO is investing in.

An **Advisory Support** component, which includes a secondee to FCDO to deepen their equalities work and six FCDO Regional Gender and Equalities advisers (RGEAs).

Within the programme there are a number of crosscutting areas, including **safeguarding, accessibility and inclusion (A&I)**, and **monitoring, evaluation and learning (MEL)**, all of which are interrelated and integral to the success of the programme. This Safeguarding framework aims to ensure that safeguarding

is embedded and coordinated across all PEP-R work. The framework embeds A&I and includes content to ensure that MEL is done in a safe way.

1.1.1. Why is it important to embed safeguarding in the three areas of work?

Creating an **Equalities Resource Hub** that is safe to use is important for two core reasons:

- If users are harmed when using or engaging with the platform and other outputs, FCDO funded work will have led to negative implications for individual platform users, and
- If particular users are not comfortable using a platform in a way that is accessible, safe and inclusive, they will not use them.

Enabling Fund interventions should contribute towards a longer-term strategic or catalytic aim around gender and equalities or be clearly responding to an immediate need or risk. The Enabling Fund information pack notes that projects should:

- Ensure their intervention will be implemented in a way that is accessible, safe and inclusive, and
- Integrate safeguarding from sexual exploitation, abuse and sexual harassment (SEAH) and other forms of harm throughout interventions, including identifying and mitigating safeguarding risks and responding to any safeguarding concerns.
- It is important that the **six RGEAs** are able to embed safeguarding into the advisory support that they provide. This can help ensure that the different interventions and staff have the support, resources and information to apply their safeguarding commitments.

1.2. Objectives of the framework

This Safeguarding framework has been developed to make sure that there is consistency between the different consortium and delivery partners and the different components of the programme. The Framework was developed in line with global standards (**CHS PSEAH Index**), aiming to ensure that safeguarding is an active consideration in programme delivery going beyond compliance. The Framework:

1. Complements the standards set by FCDO due diligence and existing partner safeguarding policies by providing PEP-R-specific guidance. The framework does not replace existing policies.
2. Outlines how PEP-R's commitment to safeguarding will be implemented and managed.
3. Outlines clear safeguarding roles and responsibilities within the PEP-R team.

1.3. Defining safeguarding

PEP-R subscribes to the following definition of safeguarding in the international aid sector:

Safeguarding means preventing harm to people in the delivery of development and humanitarian assistance. PEP-R understands safeguarding as taking all reasonable steps to prevent harm from occurring both to the recipients of project services and to people delivering it, and responding appropriately when harm occurs.

1.3.1. The harms we are safeguarding from

We want to prevent the below harms from occurring as a result of PEP-R, and to respond appropriately when harms occur¹:

- Sexual exploitation, abuse and sexual harassment (SEAH),
- Physical violence,
- Discrimination,
- Bullying,
- Harassment,
- Emotional abuse (also known as psychological abuse).

PEP-R recognises that safeguarding violations can take different forms. While some organisations tackle these harms separately², to some extent, all are safeguarding issues and have at their root the underlying problems of power differences, inequality, bias, privilege and discrimination based on race, ethnicity,

¹ Adapted from Safeguarding Hub Eastern Europe, [What is safeguarding?](#)

² For example within their Safeguarding Framework, organisations may have one policy on SEAH, a separate policy on Do No Harm, another policy on Harassment and Bullying as well as a Code of Conduct.

religion, sexual orientation, gender identity, disability, socioeconomic group, and other aspects of status and identity, including that of being a child or young person.³ **The PEP-R Safeguarding framework recognises this alignment as marginalised people – the project focus – are at high risk of a broad spectrum of harms.**

PEP-R uses the following international definitions for the harms noted above.

Generally, FCDO focuses on Safeguarding from SEAH. Sexual exploitation, abuse and sexual harassment (SEAH) is an umbrella term relating to different sexual harms.⁴

Sexual Exploitation: Any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including profiting monetarily, socially or politically from the sexual exploitation of another.

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

Sexual Harassment: Unwelcome sexual advances (without touching). It includes requests for sexual favours, or other verbal or physical behaviour of a sexual nature, which may create a hostile or offensive environment.

Other forms of harm, beyond SEAH, are damaging in and of themselves, they can also be indicators of sexual or more violent forms of harm:

Physical Violence: The intentional use of physical force or power, threatened or actual, against oneself, another person, or against a group or community, that either results in or has a high likelihood of resulting in injury, death, psychological harm, maldevelopment, or deprivation.⁵

Discrimination: Any unfair treatment or arbitrary distinction based on a person's identity or personal attributes. Discrimination may be an isolated event affecting one person or a group of persons similarly situated.⁶ The UK Equality Act recognises "protected characteristics" which are specific personal attributes that are protected from discrimination. These include: age, disability, gender

³ Adapted from Safeguarding Hub Eastern Europe, [What is safeguarding?](#)

⁴ The definitions relating to SEAH are from: [UK Strategy: Safeguarding Against Sexual Exploitation and Abuse and Sexual Harassment within the Aid Sector.](#)

⁵ WHO, The Violence Prevention Alliance, [Violence Prevention Alliance Approach.](#)

⁶ Adapted from United Nations Secretary-General's bulletin, [Prohibition of discrimination, harassment, including sexual harassment, and abuse of authority.](#)

reassignment, marital or civil partnership status, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

Bullying: Rude, abusive, or threatening behaviour or misuse of power that intends to make a person feel humiliated or ashamed.⁷

Harassment: When bullying is because of a person's identity or who they are such as their age, sex, race, ethnicity, disability, religion, sexual orientation or gender identity, etc. Often harassment is covered by law.⁸

Emotional abuse (also known as psychological abuse): Infliction of mental or emotional pain or injury. Examples include: threats of physical or sexual violence, intimidation, humiliation, forced isolation, social exclusion, stalking, verbal harassment, unwanted attention, remarks, gestures or written words of a sexual and/or menacing nature, destruction of cherished things, etc.^{9,10}

There are also specific safeguarding risks for children in the delivery of development assistance.

Child safeguarding: The responsibility of organisations to ensure they do no harm to children (all people under the age of 18 years, as per the UN Convention on the Rights of the Child). This means doing all they can to prevent exploitation and abuse, and if abuse occurs, to respond appropriately. All actions on child safeguarding should be taken in the best interests of the child or children.¹¹ Harm to children includes:

Physical abuse: When someone hurts or harms a child or young person on purpose. It also includes making up the symptoms of an illness or causing a child to become unwell.¹²

Emotional abuse: This includes persistent emotional maltreatment that impacts a child's emotional development. Emotionally abusive acts include restriction of movement, degrading, humiliating, bullying (including cyber bullying), and

⁷ Safeguarding Resource and Support Hub, [Bullying and Harassment Factsheet](#).

⁸ Adapted from Ibid.

⁹ GBV AoR, [Handbook for Coordinating Gender-based Violence Interventions in Emergencies](#).

¹⁰ While we note that there is no global standard definition of emotional and psychological abuse and that definitions can vary between countries, we will use the above definition.

¹¹ Adapted from Keeping Children Safe, [Understanding Child Safeguarding](#).

¹² Ibid.

threatening, scaring, discriminating, ridiculing or other non-physical forms of hostile or rejecting treatment.¹³

Child sexual abuse and exploitation: Under UN regulations, all sexual activity with someone under the age of 18 is considered to be sexual abuse, regardless of the age of majority or consent locally. Mistaken belief in the age of a child is not a defence.¹⁴ Sexual abuse can be either in-person or in digital settings. Child sexual exploitation is a form of sexual abuse that involves children being engaged in any sexual activity in exchange for money, gifts, food, accommodation, affection, status, or anything else that they or their family needs.¹⁵

1.3.2. Who we are safeguarding

We are safeguarding everyone who comes into contact with PEP-R. This includes people who engage and interact with the interventions directly and indirectly, people who use the Equalities Resource Hub and staff working on PEP-R, including volunteers.

People who are more likely to experience a safeguarding violation are those who already experience discrimination in society such as women, children, people with disabilities, ethnic/racial minorities and LGBT+ individuals.¹⁶ They are also less likely to disclose or report their abuse.¹⁷ As these are the primary focus populations of PEP-R, it reiterates the importance of integrated safeguarding throughout the programme.

It is important that people who come into contact with the programme, particularly those who are already experiencing discrimination and exclusion, are meaningfully involved in defining the ways in which they feel safe and identifying the ways in which they wish to be protected. For example, they should be included in risk assessment procedures, in the design of reporting procedures and in deciding appropriate support if harm does occur (see below for more information).

¹³ Ibid.

¹⁴ [Glossary on Sexual Abuse and Exploitation](#), Second Edition.

¹⁵ Adapted from Keeping Children Safe, [Understanding Child Safeguarding](#).

¹⁶ Adapted from Safeguarding Hub Eastern Europe, [What is safeguarding?](#)

¹⁷ In relation to people with disabilities see [IDDC Inclusive Safeguarding](#).

1.4. Who the framework applies to

PEP-R is delivered by a range of consortium and implementing partners, as well as by FCDO itself. The term “partners” is used below and collectively includes:

Consortium partners: Plan International UK; Social Development Direct; Sightsavers.

Enabling Fund and Advisory support partners: FCDO missions / posts delivering or supporting Enabling Fund Projects; FCDO missions / posts supported by RGEA staff.

Enabling Fund Implementing Partners: National Implementing Partners delivering Enabling Fund projects.

This Framework applies to all partners and individuals who are contracted specifically to work on PEP-R as well as staff who are working on PEP-R as part of their existing role. This may include staff, consultants and volunteers in the UK and across the globe in partner organisations and in FCDO. These are collectively called “staff and associates”.

1.5. PEP-R Safeguarding Principles

All organisations delivering PEP-R will be guided by their own organisational policies, principles and values¹⁸ as well as by FCDO requirements¹⁹ (which embed the IASC 6 core principles). The following principles have been brought out as they are particularly key to delivering safe, accessible and inclusive work (in digital settings and in-person) that is enabling for equalities and marginalised populations:

- All individuals (including children and adults) shall be treated equally, irrespective of age, disability, gender reassignment, marital or civil partnership status, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
- Everyone has responsibility for safeguarding.

¹⁸ These are often included within an organisation’s policy or Code of Conduct.

¹⁹ Which are included in all grant agreements.

- In order for staff and associates to understand and deliver safeguarding measures, related communications and outputs need to be accessible to all.
- We strive to Do No Harm, and to respond appropriately if harm occurs.
- We prioritise the rights, needs and wishes of the survivor (through a survivor-centred approach).
- We recognise that harms can occur in person and in digital settings.
- We have zero tolerance for inaction.

2. Procedures for PEP-R partners and activities

2.1. Due diligence of partners and staff

Each partner organisation will undergo FCDO's due diligence process (in the UK or in the FCDO mission/post). In turn, each partner organisation will be expected to ensure the same safeguarding as they themselves are subject to by FCDO.

The existing **FCDO due diligence pillars** on safeguarding from SEAH would apply to all forms of harm. This includes consideration of partner: (i) Policy / standards; (ii) complaints / whistleblowing; (iii) recruitment / training; (iv) risk management; (v) code of conduct; (vi) governance and accountability.

Depending on the degree to which children are involved, FCDO's **Child Safeguarding Due Diligence** can be used to complement the safeguarding from SEAH due diligence pillars (they were designed to complement each other). For programmes which involve children (directly or indirectly), all six pillars must be adequately covered.

If deemed necessary, based on risk, and if resources allow, specific partners can be supported by the SDDirect team (who lead the PEP-R safeguarding technical component) to develop or strengthen their Safeguarding measures based on the due diligence findings through information, training or advisory support (as per resource availability).

2.2. Policy and Code of Conduct

All implementation partner staff and associates are required to abide by their organisational safeguarding policy or equivalent (e.g. this could also be a staff misconduct policy and/or a PSEAH policy). All staff and associates are expected to meet the expectations set out in their organisation's Code of Conduct.²⁰

Each partner organisation should also ensure that staff and associates are aware of and understand the safeguarding policies and processes that apply to them, and understand, support and sign (where necessary) the relevant Code of Conduct. If a partner (see list of partners in section 1.4) does not have a relevant Policy or Code of Conduct, they are required to meet the expectations set out in the **FCDO Supplier Code of Conduct**.

Appropriate action will be taken against staff who breach their organisational code, including disciplinary action in line with the established processes of the employing organisation and/or referral to relevant authorities for action where necessary.

See point 2.2. for situations where partners do not have a policy or code of conduct.

A note on embedding diversity and equality in safeguarding policies and procedures:

Many safeguarding policies highlight the importance of diversity and equality. This is particularly key for PEP-R-related activities due to the core aim of the programme. From experience, we know that safeguarding risks vary for different people. We also know that safeguarding systems, practices and procedures, for example reporting mechanisms, will not work well if they are only accessible to some people and not others, whether due to factors such as disability, language, low literacy, access to technology or transport, or the social norms and cultural beliefs that staff and other members of society may hold.

²⁰ Code of conduct should be aligned with the [IASC Six Core Principles](#).

It is particularly important for PEP-R partners to ensure that their safeguarding policy and procedures are appropriately contextualised for all PEP-R-related activities, initiatives and audiences.

For partner organisations who are delivering initiatives in digital settings (including on social media, messaging app and on other digital platforms etc.), content relating to a digital Code of Conduct or expected digital behaviour is required. The **PEP-R Equalities Resource Hub Community Guidelines** can be used as an example for this.

2.3. Complaint mechanism

Each partner organisation should put in place a minimum of two reporting channels through which programme participants and others can report harm. A complaint mechanism outlines how people can report – this may be via an email message, a QR code, a phone call, an online form or in a face-to-face meeting.²¹

Everyone who works or interacts with partner organisations (people receiving aid as well as staff, volunteers and associates) should be able to access and make a complaint easily and freely.

Before complaints mechanisms are put in place, it is important to ensure that services are in place should you need to refer victim/survivors. **This document** outlines how you can create a referral pathway.

Also, it can be valuable to have an incident reporting form in place to ensure that core information is being gathered in a confidential and safe manner. You can adapt **this incident reporting form** to your organisation. For guidance on how to prepare to receive reports of sexual exploitation and abuse, refer to **this infographic**.

2.4. Safeguarding focal point

Each partner should identify a safeguarding focal point to lead their safeguarding work for the Enabling Fund project. A list of safeguarding focal points across PEP-R will be collated by FCDO so that relevant updates and information can be shared with the focal points as needed.

²¹ Adapted from Safeguarding Hub Eastern Europe, Safeguarding Essentials.

The project safeguarding focal point will lead safeguarding advice for the project (where necessary) and will refer cases and concerns related to their organisation to their organisation safeguarding lead in line with existing organisational escalation procedures.

It is likely that the project safeguarding focal point will not be the same person as the organisation's safeguarding lead. For example, at SDDirect, which is leading the implementation of the Equalities Resource Hub, the project safeguarding focal point is Anna Gawn. The SDDirect, organisational safeguarding focal point is a senior staff member with whom all cases and concerns will be shared in line with existing organisational procedures.

2.5. Risk Management

All partners and elements of PEP-R should take a risk-based approach to safeguarding. It is important that this risk-based approach is updated in relation to the individual groups and activities delivered as part of PEP-R. This must include groups that PEP-R is directly engaging with as well as others who may interact with the work.

The risk management process identifies specific risks for specific groups, assesses the likelihood and impact of harm, puts in place mitigations to prevent the harm from occurring, and monitors the risks over the course of the programme. **This Risk Assessment and Management document** and risk register template can be used to guide the process where Enabling Fund delivery partners do not have procedures or templates in place already.

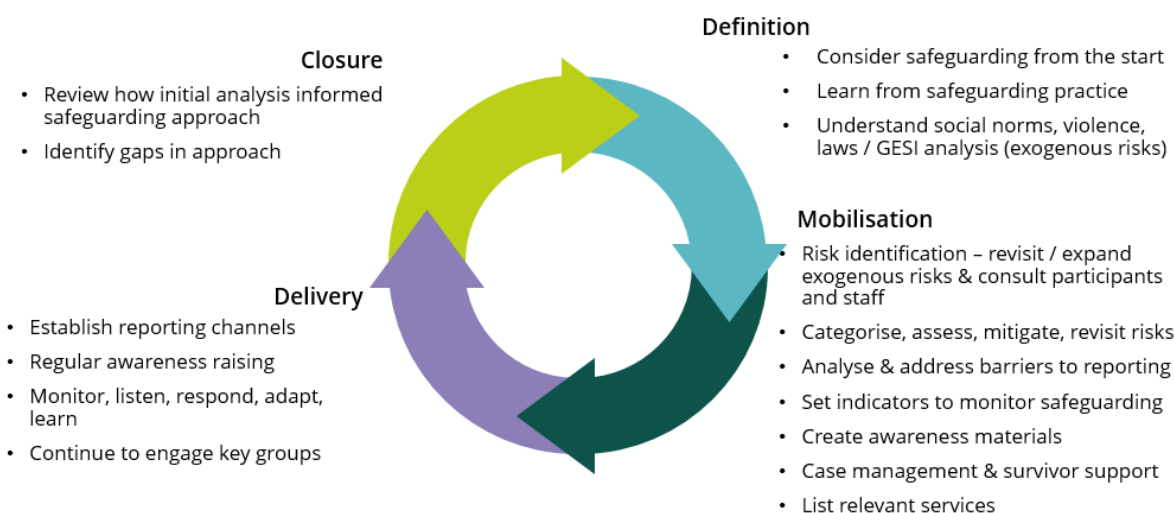
FCDO may identify high- and medium-risk projects and, where there is a need and demand, SDDirect as the safeguarding technical lead can provide advice and support to partners to mitigate those risks.

It is also crucial that, in this process, **specific risks that staff and associates may face** as a result of working on PEP-R are identified and managed. Over time, PEP-R may become a prominent actor promoting equalities globally and in specific countries. Response to the content shared and initiatives promoted by PEP-R will be varied, it is possible that there may be backlash and negative communications through the PEP-R email address, other contact channels (including social media if an account is developed) and in person to representatives and participants of projects.

An Equalities Resource Hub risk register has been developed and will be regularly reviewed ahead of the website launch and thereafter (on a monthly basis until launch and quarterly for the rest of the programme).

2.6. Integrate safeguarding through the project cycle

It is expected that safeguarding is integrated throughout the design and implementation of all aspects of the programme. The below project cycle diagram can be used to guide partners in this.



2.7. Training of staff and associates and awareness raising

For reports to be made and action to be taken, it is essential that staff, associates and partners are aware of PEP-R's safeguarding commitments and the processes for raising complaints.

Training: All partner staff and associates related with PEP-R are expected to undergo safeguarding training if they have not received it in the last year. In person training is valuable because it fosters conversation and allows staff to ask specific questions related to their project. Alternatively, it can be valuable to ask staff and associates to undergo e-learning (and to share the certificate of completion), such as **the Safeguarding hub training**, and to complement this with an information session to give staff and associates the opportunity to ask questions about their specific project or context. Due to the nature of PEP-R, it would be valuable to integrate a specific focus on the risks for marginalised

groups. For FCDO staff, the Safeguarding E-Learning Course on HERA Learn is mandatory to complete on an annual basis.

Share Safeguarding framework: Share this Safeguarding framework with all partner organisations. Ensure that all staff and associates are aware of their duties and know what and how to report and escalate.

Support sessions: On request, hold advisory technical support sessions with Enabling Fund project leads (FCDO Posts) and implementing partners on specific topics as guided by FCDO and partners, e.g. risk management.

Promotion of reporting procedures: Each Enabling Fund Implementing partner to create and promote contextually relevant visual aids, posters and presentations which outline reporting procedures and how reports are responded to.

Include a copy of Safeguarding framework on the Equalities Resource Hub.

2.8. Safe Communications

Recognising the specific marginalised groups that PEP-R is working with, a risk-based approach to communications is key to ensuring safe media and communications. Communications can include all communications with external stakeholders on events as well as on reporting and safeguarding measures. Partners should ensure that:

Your organisation's right to use a person's information and images can only be granted through **informed consent** from the person(s) in question. Ensure that consent is gathered for all information and images collected. This includes from all public speakers and project participants. [Click here](#) for a consent form.

- **A note on consent:**
 - Determining the capacity to consent of people with disabilities can be complex. Partners should first assume capacity to consent, ensure consent is checked throughout the process (capacity to consent may differ for different decisions) and ensure that information is communicated to the person in a way they understand (as capacity to consent depends on understanding).²²

²² See the [Women Refugee Commission's GBV Disability Toolkit](#) for more information on informed consent and how to navigate the informed consent process for adults with disabilities.

- For LGBT+ people, there may be specific risks associated with speaking openly about LGBT+ inclusion and with sharing information and images without consent, including “outing” people.
- Children give assent, not consent. A parent or formal caregiver will need to be included in the consent process. Read **this document** for more information.
- For photos from public events, if photos are deemed necessary and safe, advise participants that photos may be taken of groups or crowds (on arrival or in the invitation). Where this advice has not been shared, only use photographs where people who have not provided consent are not identifiable / their faces are not shown. Where necessary, consider blurring faces and/or re-constructing voice audio.
- Exercise sensitivity and caution (assess the risks) when determining the appropriateness and suitability of images. Consider the situation now and in the future. Seek alternatives to images if the risks of sharing images are too high or if potential future scenarios are unknown.
- Keep your messages respectful and balanced.
- Respect and protect people’s privacy and confidentiality. If you decide it is safe to share information about specific marginalised people, do not use full names or any information that can identify the location of the person. Identifying information can include writing the full name and address, community / ward number and it could also be a school badge, or a particular landmark. Where necessary, consider blurring faces and/or re-constructing voice audio.
- Ensure your media and communications are accessible to all people, particularly on reporting procedures and other safeguarding measures. This may include using a range of different communications methods, for example, sign language interpretation, using audio-visual or captioning options and holding consultations in accessible venues.
- Any concerns regarding inappropriate use of the images and communications content should be reported in accordance with the normal process for a breach of the Safeguarding framework.

To read more information on safe media and communications, **read this** note.

2.9. Research ethics and safe MEL procedures

2.9.1. Research ethics

PEP-R aspires to high ethical standards and is informed by ethics, principles and standards for research, evaluation and monitoring.²³ All resources uploaded onto the Equalities Resource Hub at launch (June 2024) are existing FCDO-funded publications that are already in the public domain and have not been developed by the programme. It is not possible for the PEP-R team to check that all these resources followed these or similar ethical principles and standards, and therefore, where necessary, consent obtained. A disclaimer will therefore be added to the website. When the programme generates its own resources, it will adhere to high ethical standards.

2.9.2. Safe monitoring and evaluation and research

Safe M&E and research ensures everyone involved is protected from harm either as a direct or indirect result of the activity. This requires partners to follow the core points in this Framework, including ensuring all the structural procedures are in place and that a risk-assessment of the process is completed.

This risk assessment process will consider key safeguarding risks across M&E related activities and interaction points. A critical safeguarding focus area among partner M&E activities will be (online, offline) data collection and management, given its higher risk of doing harm than other M&E processes. Power imbalances are inherent in monitoring, evaluation and research activities. This understanding will extend to an annual review of safeguarding risks in MEL systems and processes, conducted collaboratively by the PEP-R Safeguarding and MEL focal points.

[Click here](#) for more information on safe MEL and **[click here](#)** for 10 tips on conducting safe monitoring visits.

2.10. Monitoring awareness and compliance

Monitoring how all partners (see section 1.4 for list of partners) are implementing the Safeguarding framework will be an important component to ensure that PEP-R has effective mechanisms in place and is able to learn lessons

²³ See [FCDO ethical guidance for research, evaluation and monitoring activities](#).

about what is working and what is not in relation to rolling out safeguarding for the programme.

Monitoring will be carried out by the Safeguarding Technical Lead at key stages (e.g. every 6 months) and findings will be shared back at an aggregate level (not identifiable) with all partners.

Key monitoring activities will look at:

- Whether staff and associates are aware and confident about their safeguarding duties,
- Whether staff and associates are aware and confident about how and what to report and escalate,
- Whether reporting procedures are being used,
- Whether Equalities Resource Hub users are aware of the community guidelines and their expected digital behaviour,
- Findings from this process will allow the programme to adapt and improve our approach, such as revising procedures that are not effective or appropriate in practice.

2.11. Staff care and wellbeing

Due to the nature of the programme, it is valuable to consider staff care and wellbeing throughout PEP-R. This will be important for staff in particular roles, including partner staff and associates working directly with marginalised groups and in communities and staff monitoring the general Equalities Resource Hub email address. Each partner organisation should take their own steps to support staff on Enabling Fund projects.

For the Equalities Resource Hub, the following steps will be taken:

- Alternate staff checking the emails,
- Procedures in place for dealing with harmful content,
- Procedures to block regular senders of abusive content in place.

3. Responding to safeguarding concerns

3.1. Reporting and receiving a safeguarding concern

By virtue of being involved with PEP-R, all staff may receive a report or witness a concern. Once received, a report should be reported in line with their own organisation's case handling procedures. Staff members, associates, programme participants, Equalities Resource Hub users and others are encouraged to report safeguarding concerns. As noted in the box above, safeguarding concerns relating to PEP-R can be reported and received in various ways. Reports can be received through the following channels:

Enabling Fund

National implementing partner safeguarding focal point or leadership. (Contact details will vary based on country and as such are not included in this Framework. These details will be collected at a central consortium level before year 2 Enabling Fund programming starts).

FCDO post/mission safeguarding focal point or leadership.

Equalities Resource Hub

Reporting (anonymous and not) is available on the Equalities Resource Hub:
<https://equalitieshub.org/report-concern>.

Reports can be emailed to the general Equalities Resource Hub reports address:
info@equalitieshub.org.

Other options

FCDO general safeguarding enquiries email (**reportingconcerns@fcdo.gov.uk**) or Telephone (+44 1355 843 747).

PEP-R Team Lead, Maria Vlahakis: **maria.vlahakis@sddirect.org.uk**.

The PEP-R Safeguarding Technical Lead: **anna.gawn@sddirect.org.uk**.

3.2. Identifying a safeguarding concern

All PEP-R staff and associates should have received safeguarding training in the past year. If they have not, they or should receive safeguarding training which

includes information on how to receive a disclosure and how to report allegations of abuse or breaches of safeguarding policies.

Over time, PEP-R may become a prominent actor promoting equalities globally and in specific country contexts. It may be that the PEP-R Equalities Resource Hub or staff and associates receive reports regarding incidents of violence and abuse that are **not related** to **PEP-R** staff, associates or activities. There are ways to determine next steps in these cases, depending on where the report is received:

1. Where Enabling Fund projects receive reports, the relevant organisation can lead the response and, if needed, liaise with the FCDO Post / Mission (and the Safeguarding Technical Lead at SDDirect if deemed useful or necessary) on the most appropriate response.
2. Where reports are shared to the Equalities Resource Hub, the SDDirect Team Lead and the Safeguarding Technical Lead should liaise on the most appropriate response.
3. Where reports are shared with the PEP-R secondee and/or one of the six RGEAs, the RGEA will liaise with safeguarding leadership in the organisation in which they are based.

In line with the above principles, there is always a duty of care to do something (e.g. zero tolerance to inaction) within the limits of the victim-survivor's consent. The reports of harm can be categorised and responded to as follows:

Harm category	Appropriate action
Harm caused by PEP-R staff or activities that breach the PEP-R delivery partner policy or PEP-R Safeguarding framework.	Referred to specific partner focal point or leadership for response.
Potential harm caused by other actors working in the humanitarian and development space. Not related to PEP-R.	Acknowledge email. Refer confidentially to perpetrating actor(s) for their follow up. Follow up or provide information about relevant local services as needed / possible.

Harm caused in the general public that is nothing to do with any PEP-R staff or activities, or related to aid work.

Acknowledge email. Provide information about relevant local services if needed and if possible.

3.3. Reporting to local authorities

In situations where the law has been broken the partner will need to make a decision about whether to report to authorities. Being survivor-centred, the programme advises that partners assess further risks it could expose the survivor to before reporting cases to the authorities. Based on this, partners should always gather informed consent and act in accordance with the wishes of the survivor, including when deciding whether to report the case to the authorities. If the survivor is a child under the age of 18, PEP-R partners may have an obligation to report to authorities. In such cases it is important to try to gain assent²⁴ from the minor and if acting in their best interests is in opposition to their choice, explain why the decision is being taken for them. Also, there will be other exceptions where the survivor may not be able to make a rational decision and provide informed consent themselves, for instance where survivors are: persons with intellectual disabilities, severely traumatised and/or in shock, in high-risk situations or at risk of further harm. Also, in not reporting, others may be placed at significant risk of imminent harm. In such situations PEP-R partners may make decisions without informed consent (or assent) of the survivor. The consent of caregivers or other trusted persons will be sought in such situations.

In the case of disclosures involving a member of a government run institution, the PEP-R partner should refer to any country or location-specific service mapping and seek support from FCDO in the relevant country. This will ensure considered management of any reporting to the authorities and the consideration of political risks.

3.4. Case handling

All cases of SEAH need to be shared with FCDO as per contractual requirements.

²⁴ A child cannot give consent. A child can give assent.

Each partner should have their own case handling team. In each partner organisation, this group is responsible for making an assessment of the case and deciding next steps, such as whether further information gathering is required, whether an investigation needs to be commissioned, who should lead and/or be involved in the investigation, and whether the relevant authorities should be informed.

If a partner does not have their own case handling team and / or requires support in a case handling process, FCDO (in the UK and in posts / mission, including the Need-to-Know committee) may provide advice and support. Where resources are available and there is demand, SDDirect can provide case handling and investigation advisory support.

A note on child safeguarding: In the UK it is illegal for those in a position of trust to engage in sexual activity with a child under 18 in their care (Sexual Offences Act, 2003). This Act also enshrines extraterritorial powers enabling the UK to prosecute UK nationals who commit sex offences against children overseas, including where the offence is a crime in the UK but not overseas. FCDO expects its staff and all UK partners and individuals involved in the delivery of aid to be fully aware and comply with this legislation.

If there is a child survivor or witness, any interviews should be undertaken by specially trained professionals.

3.5. Confidentiality and information sharing

While it is important to ensure that FCDO and consortium organisations are kept informed of incidents and breaches of the Safeguarding framework, this must be done in line with relevant data protection and confidentiality considerations. Partners in the UK should align with legislation including the Data Protection Act 2018 as well as statutory guidance.²⁵ Partner organisations outside of the UK should share information a 'need to know' basis. This is essential in order to maintain the confidentiality of survivors/complainants and other parties, particularly where they may be at risk.

Should the safeguarding report relate to staff or associates of a consortium or partner organisation, the point of contact / Team Lead in the partner

²⁵ For example, see FCDO, [Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children](#).

organisation will be notified and an agreement will be reached on how to proceed.

Depending on the nature of the case and the degree to which the incident relates to PEP-R activity and the potential impact on the reputation of PEP-R, other consortium partners with no direct relevance to the safeguarding incident may be informed that a safeguarding report relating to a consortium partner has been received and is being dealt with.

A final notification on outcomes in line with legislation will be communicated to consortium partners where appropriate.

4. Roles and responsibilities

Safeguarding roles and responsibilities across PEP-R

FCDO Management Team, London

This management team includes the key staff who are coordinating and managing PEP-R from the London FCDO office.

- Key responsibilities include: Approving the Safeguarding framework and being notified of any updates and changes thereafter; requesting updates and lessons on safeguarding in reporting; ensuring that safeguarding processes are implemented across the whole PEP-R programme; ensuring that FCDO Missions and Posts embed safeguarding throughout the different PEP-R projects; and reviewing the Equalities Resource Hub safeguarding risk management bi-annually or as needed.
- Identify high- and medium-risk projects to the SDDirect safeguarding technical lead for support sessions.
- Refer any received cases to the appropriate case handling and investigation team in a timely manner. Note: this may be within FCDO as well as in the delivery partner.
- Is made aware of all PEP-R-related incidents / cases for information and oversight. This should include general information about a case and no identifiable information.

**Team Leader
or from each
central
consortium
partner**

- Collect details of safeguarding focal point and FCDO post/mission focal point details.
- Is not involved in case handling.

The central consortium consists of staff working on PEP-R from Plan International UK, Social Development Direct (SDDirect) and SightSavers.

- Within the consortium, each organisation abides by their own policy and refers to this framework for their specific PEP-R responsibilities.
- Each organisation has ultimate accountability for all PEP-R safeguarding relating to their organisation.
- SDDirect is the Safeguarding Technical lead. This responsibility is limited to technical advice for PEP-R tasks (see section below). As above, SDDirect is responsible for their own organisation's safeguarding.
- Refer any received cases to the appropriate case handling and investigation team in a timely manner.
- Is made aware of PEP-R incidents / cases that are relevant to their specific organisation only. This should include general information about a case and no identifiable information.
- Is not involved in case handling.

**Safeguarding
Technical
Lead at
SDDirect**

One safeguarding technical advisor based in SDDirect has time allocated to support safeguarding in PEP-R.

- Key responsibilities include: Developing, sharing and updating Safeguarding framework; providing technical support and advice so that that safeguarding processes are implemented across all PEP-R initiatives; developing and strengthening safeguarding procedures across PEP-R; providing technical advice, advice sessions and support as needed to FCDO missions/posts and other partners to ensure that safeguarding is embedded in the Enabling Fund projects; managing documentation and learning relating to safeguarding across PEP-R; writing and monitoring risk register for Equalities

**FCDO
Manager of
PEP-R Project
in Mission /
Post**

Resource Hub and embedding safeguarding into Equalities Resource Hub design and delivery.

- Provide support to high- and medium-risk projects identified by FCDO.
- Refer any cases received to the appropriate case handling and investigation team in a timely manner.
- Is made aware of all PEP-R-related incidents / cases for learning, additional support and adaptation of procedures as needed. This should include general information about a case and no identifiable information.
- Share lessons, reports and updates relating to Safeguarding with the safeguarding focal points, FCDO and other consortium organisations in reports and as appropriate.
- Is not involved in case handling.

This individual is responsible for the management and delivery of the PEP-R Enabling Fund project in the FCDO mission/post.

- Ensure that due diligence is completed in a timely manner for all delivery partners.
- Responsible for advising and supporting delivery partners so that they can uphold their safeguarding responsibilities.
- Where a FCDO mission/post is delivering the work themselves, the FCDO mission / post has the ultimate responsibility for safeguarding across the project.
- Bring in safeguarding technical advice and support if required from the central SDDirect team.
- Refer cases to appropriate case handling and investigation team within the appropriate organisation and country in timely manner.
- Is made aware of PEP-R incidents / cases that are relevant to their country. This should include general information about a case and no identifiable information.

Delivery partner of Enabling Fund project

- Update FCDO Oversight / Central team and SDDirect Safeguarding Technical lead of cases that arise as a result of PEP-R. This should include general information about a case and no identifiable information.
- Is not involved in case handling.

This is the partner who receives the funding from FCDO mission/post and who is delivering the PEP-R-related activities.

- Ultimate accountability for all safeguarding relating to the Enabling Fund project delivery.
- Key responsibilities include: share this Safeguarding framework with staff; identify and manage safeguarding risks throughout project; deliver training, support sessions and awareness with staff; create and share reporting procedures; carry out local service mapping; learn and share safeguarding lessons throughout project.
- Lead case handling and investigations for all Enabling Fund-related cases.
- Share updates with FCDO as appropriate.
- Seek advice from FCDO and Safeguarding technical lead as needed, this may include: when a case is particularly complicated, when a case may go public and/or may affect the reputation of PEP-R and FCDO.

All PEP-R staff and associates

This includes all staff who are working on PEP-R-related activities as part of their existing role (e.g. the RGEAs) and staff who have been brought on specifically for PEP-R-related work (e.g. the secondee):

- Comply with employing organisation's policies, Code of Conduct, this Safeguarding framework as well as any additional expectations in the Code of Conduct of their employing organisation.
- Escalate / report any concerns using your organisation's reporting channel or the reporting channels noted above.

**PEP-R
delivery
partner case
handling and
investigation
team**

Each organisation delivering PEP-R projects or activities in FCDO mission/posts will have their own case handling and investigation procedures.

- Receive cases and complaints relating to their own organisation.
- Liaise with safeguarding lead as appropriate in process.
- Manage case and investigate if needed in a survivor-centred, appropriate and timely manner.



T: +44 (0) 300 777 9777

E: info@sddirect.org.uk

Finsgate, 5-7 Cranwood Street
London, UK, EC1V 9LH

www.sddirect.org.uk