

# SAFEGUARDING POLICY

Version : 0005.00

Date : June 2025

Scope : All Employees, Trustees, Consultants,  
Volunteers and others acting on behalf  
of Practical Action or its subsidiaries

Review Date : June 2027

<b>Approval required from</b>	Board of Trustees
<b>Policy Owner:</b>	Head of People and Culture
<b>Responsible Director:</b>	Chief Operating Officer
<b>Approval date</b>	July 2025
<b>Queries</b>	Contact the Policy Owner
<b>Exceptions</b>	Contact the Responsible Director

## 1. Roles and Responsibilities

- Clarifications on the policy content should be sought from the **policy owner**. Any changes required to the policy will be submitted through this the **policy owner** to the **responsible director**, for consideration.
- The **policy owner** is responsible for review of the policy every two years, with the next review scheduled for May 2027. Any questions or comments about this policy should be directed to the Head of People and Culture.
- Derogations from this policy require the **advance written approval** of the **responsible director**.
- The **responsible director** will seek formal approval of significant changes to this policy from the **Practical Action Board of Trustees** or their delegated representatives.

## 2. Policy Statement

- Practical Action will create a strong and effective enabling environment and a safeguarding culture to promote the rights and protection of project participants, community members, staff, volunteers or anyone else impacted by our work.
- Practical Action is committed to raising awareness of safeguarding risks and to taking measures to minimise those risks.
- Practical Action firmly believes that no person, regardless of age, gender identity, disability, sexual orientation or ethnic origin or any other personal characteristic, should experience harm, including sexual exploitation or abuse, and Practical Action takes seriously its responsibility to safeguard those who come into contact with our work.
- Practical Action will investigate and, where appropriate, respond to any suspected breach of this policy, including through disciplinary action.
- Safeguarding is an organisational and an individual responsibility. This policy applies to all Practical Action employees, trustees, consultants, volunteers, and others acting on behalf of Practical Action or its subsidiaries including partners. Practical Action welcomes requests for the policy in alternative formats. All employees, including new hires, are made aware of this policy and compliance responsibilities. This policy is available to all employees and external stakeholders via our website [Policies and commitments - Practical Action](#).

## 3. Glossary

- **Survivor**  
The person who has been harmed, abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive, however it is the individual's choice how they wish to identify themselves.
- **Child/Children**  
Children are defined by the *UN Convention of the Rights of a Child* as being someone under the age of 18 years of age, regardless of the local age of majority/consent.
- **At risk adult / Vulnerable adult**  
Those aged 18 years or over who are less able to protect themselves from harm, exploitation or abuse. Adults may be at risk due to issues related to gender, age, frailty, mental health, physical capabilities, religion/socially excluded, minority groups, poverty, disasters or conflict. Individuals do not need to identify themselves as at risk to be covered by the protections outlined in this policy.

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- **Sexual Exploitation & Abuse**

“Sexual exploitation” is any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including, but not limited to profiting monetarily, socially or politically from the sexual exploitation of another. “Sexual abuse” is the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. This includes sexual assault (attempted rape, kissing/touching, forcing someone to perform oral sex/touching) as well as rape. This may also include non-contact and online sexual exploitation and abuse.

- **Harm**

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

- **Psychological harm**

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

- **Project participant(s)**

A project participant is an individual who takes part in the project, activity, event, or program. They actively engage in the process, contribute their ideas, skills, and efforts towards achieving the goals of the project or activity. Participants play a crucial role in the success of any endeavour by bringing their unique perspectives and experiences to the table.

### Acronyms used ;

<b>CoC</b>	Code of Conduct
<b>CSGFP</b>	Country Safeguarding Focal Point
<b>IMT</b>	Investigation Management Team
<b>MIR</b>	Management Implications Report
<b>SG</b>	Safeguarding
<b>SGFP</b>	Safeguarding Focal Point
<b>SSC</b>	Safeguarding Standing Committee
<b>ToR</b>	Terms of Reference

## 4. Scope

This policy covers the harm, sexual exploitation or abuse of children or at risk adults arising from the conduct of staff or any others acting on behalf of Practical Action as well as through the design and implementation of Practical Action's programme activities.

Other policies related to this one include the *Global Code of Conduct*, *Global Complaints Framework*, *Global Complaints (Whistleblowing) Policy* and *Global Recruitment Policy*.

This policy does not cover:

- Sexual harassment of employees in the workplace – this is dealt with under *Practical Action's Equity Diversity Inclusion and Belonging Policy* (previously Diversity and Dignity at Work Policy)
- Safeguarding concerns in the wider community not perpetrated by Practical Action or associated personnel – this is covered under the *Framework for Safeguarding in Communities*.
- Complaints of harm against adults not considered 'at risk' (see glossary) – these are normally dealt with under the *Global Complaints (Whistleblowing) policy*.

## 5. Core Principles

Practical Action upholds the following core principles:

- We have zero tolerance for harm, sexual exploitation and abuse; these acts constitute gross misconduct and represent grounds for disciplinary action up to and including termination of employment.
- Sexual exploitation includes any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes and includes profiting monetarily, socially or politically from the sexual exploitation of another.
- Sexual abuse includes sexual assault (attempted rape, kissing/touching, forcing someone to perform oral sex/touching) as well as rape.
- Harm includes the psychological, physical or other infringement of an individual's rights (emotional abuse, humiliating or degrading treatment, verbal abuse, offensive name calling, constant criticism, coercive control, belittling, shaming, solitary confinement or isolation)
- Sexual activity with children (*persons under the age of 18*) is prohibited regardless of the local age of consent or local/national laws of the relevant country; ignorance or mistaken belief in the age of the child is not a defence. All sexual activity with someone under the age of 18 constitutes sexual abuse.
- Exchange of money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited. This includes the exchange of assistance that is due to project participants.
- Sexual relationships between project participants and anyone acting on behalf of Practical Action that involve improper use of influence, power, rank or position are prohibited. Such relationships violate people's rights and wellbeing, undermine the credibility and integrity of Practical Action's work and are incompatible with the values we're committed to uphold as an organisation.
- Anyone acting on behalf of Practical Action will not engage in any commercially exploitative activities with children including child labour or trafficking.
- When a Practical Action employee, trustee, volunteer, consultant or partner develops concerns or suspicions regarding harm, sexual exploitation or abuse by a Practical Action employee or anyone acting on our behalf they **must report their concerns** via the established reporting procedures. Individuals do not need to have, nor should they seek to obtain, evidence to support their concerns – the individual's duty is to report their concerns so that Practical Action can investigate appropriately.
- Practical Action employees take action to create and maintain an environment that prevents harm, sexual exploitation and abuse and promotes the implementation of this policy. Practical Action Managers at all levels have particular responsibilities to support and develop systems that maintain this environment.
- All employees, trustees, volunteers, consultants, partners and others acting on behalf of Practical Action are expected to behave in ways that safeguard others from harm, sexual exploitation and abuse.
- Practical Action is committed to pursuing a survivor-centred approach and seeks to empower survivors and promote their recovery by prioritising their rights, needs and wishes.
- Confidentiality will be maintained at all times when dealing with safeguarding concerns. Information relating to the concern and subsequent case management will be shared on a need to know basis only, and will be kept secure at all times.

## 6. Safeguarding Commitments and Obligations

## Practical Action Safeguarding Policy

Across our entities, Practical Action's managers will ensure that we:

- 6.1 Standards: Incorporate this policy in induction for employees, trustees, volunteers, consultants, partners and others acting on behalf of Practical Action. Employees will be required to sign a declaration stating that they have received and understood it via NETconsent or Appendix 1. Anyone acting on our behalf is required to sign up to this policy and our Code of Conduct which sets out minimum standards of professional behaviour.
- 6.2 Awareness and training: Create and maintain mechanisms to systematically make Practical Action employees, trustees, volunteers, consultants, partners, others acting on our behalf and the communities we serve, aware of measures to prevent and respond to harm, sexual exploitation and abuse. Regular training will be provided to employees to develop their understanding of appropriate behaviours and their responsibilities in relation to safeguarding.
- 6.3 Focal Point: Appoint, train and support a *Safeguarding Focal Point* in each country location to co-ordinate and implement the policy and handle reports.
- 6.3 Reporting mechanisms: Establish and ensure that mechanisms for reporting harm, sexual exploitation and abuse are accessible, particularly to all programme participants of Practical Action, and that the Safeguarding Focal Point, responsible for receiving complaints, understands how to undertake their duties.
- 6.4 Recruitment: Aim to prevent people who are deemed unsuitable to work in our sector from gaining access to employment. In compliance with applicable laws and to the best of our abilities, we will prevent perpetrators of harm, sexual exploitation, abuse from being employed at or engaged by Practical Action.

We will do this by referencing our commitment to Safeguarding in job adverts and, wherever possible, by undertaking appropriate background and criminal reference checks. Where formal background checks are not practical, Appendix 2 must be completed by the individual and retained on file.

Two employment references covering three years must be requested from the person responsible for HR including the current/most recent employer. All reference templates must ask for information about safeguarding misconduct. When relevant to the job, interview questions will include specific questions about the candidate's awareness of safeguarding.

In addition to all pre-employment screenings, Practical Action also participates in the Interagency *Misconduct Disclosure Scheme* to stop perpetrators of sexual misconduct moving between organisations undetected through a request to all employers for Statement of Conduct for the employee being hired. The Scheme facilitates sharing of misconduct data between employers. It is currently implemented by over 250 organisations.

- 6.5 Safeguarding self-assessment: Each Country office will complete the Safeguarding self-assessment on an at least annual basis and the resulting score will be submitted as part of quarterly key performance indicator monitoring.
- 6.6 Community awareness: Ensure measures are taken so that our programme participants are aware of their right to, and how to, report their complaints and concerns in accordance with our *Framework for Safeguarding in Communities*.
- 6.7 Programme work: Design and undertake all programmes and activities in a way that protects people from risk of harm. This includes the way in which information about individuals in our programmes is gathered and communicated.
- 6.8 Partnerships: Ensure that when engaging in partnership, sub-grant, sub-contract or sub-recipient agreements, these agreements;
  - 6.8.1 incorporate this Policy as an attachment;
  - 6.8.2 incorporate any Donor specific reporting mechanisms.
  - 6.8.3 include the appropriate language requiring such contracting entities and individuals, and their employees and volunteers to comply with this policy;

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6.8.4 expressly state that the failure of those entities or individuals, as appropriate, to take preventive measures against harm, sexual exploitation and abuse, to investigate allegations thereof, or to take corrective actions when sexual exploitation or abuse has occurred, shall constitute grounds for Practical Action to terminate such agreements.

6.9 Representation: Ensure that all representation of project participants conforms to the guidelines on use of photographs and working with the media and communications materials (see 9. *Below Communications and Representation*).

6.10 Policy Review: Undertake a review of this Policy at least every two years.

6.11 There will be one Trustee identified as the safeguarding focal point for the Board.

## 7. Reporting

7.1 Obligation to report: Should any individual receive any information about, or observe, actual or suspected harm, sexual exploitation or abuse they must report this immediately via one of the two methods below:

- To the *Safeguarding Focal Point* or, if the safeguarding focal point is involved, another senior manager
- To our dedicated reporting service: details for this service can be found in the '*Global Complaints (Whistleblowing) Policy available on NETconsent or pA website*

Practical Action will accept complaints from employees and any other individual including external sources such as members of the public, partners and official bodies.

7.2 Reporting procedures: Procedures on how to report harm, sexual exploitation and abuse, appropriate to the local context, and our "*Statement of Commitment to Safeguarding*" must be clearly displayed to ensure that all individuals and communities are aware of these reporting procedures.

7.3 Protection of reporters: Individuals covered by this policy and communities are encouraged to report concerns over harm, sexual exploitation and abuse. To the best of our abilities, we will protect persons from retaliation when allegations are made in good faith. This protection may include anonymity.

7.4 Malicious reporting: Malicious and intentionally misleading reporting will not be tolerated and may result in disciplinary action.

## 8. Response

8.1 Responsibility to respond: Under no circumstance will concerns of abuse and inappropriate behaviour be ignored.

8.2 Welfare: The immediate physical and psychological safety of the survivor and the person reporting the concern will be of paramount importance and reasonable steps will be taken to maintain their safety.

8.3 Investigation: Any reports of actual or suspected exploitation or abuse will be appropriately investigated. This might include the use of appropriate interviewing practices with complainants and witnesses. We may engage professional investigators or secure investigative expertise as appropriate. Any investigation would be conducted in an impartial manner with the aim of establishing the facts and will not begin with preconceived ideas.

8.4 Notification: The Chief Executive and the Chair will be kept updated on any allegations that could,

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constitute a serious incident as defined by the *UK Charity Commission*.

- 8.5 In some circumstances, depending on the nature of the incident and the appropriateness of the reporting, we will notify the police, local authority or other relevant regulator or statutory agency such as the *Charity Commission* in the UK.
- 8.6 In order to prevent perpetrators of safeguarding or other serious misconduct from continuing to work in our sector, we have a duty to pass on concerns to future employers. We also have a duty of care to provide references that are true, accurate and fair. In light of these obligations, Practical Action may notify future employers of misconduct it is aware of. Please refer to the *Global Recruitment Policy*.
- 8.7 Action: Breaches of this policy by employees are likely to constitute gross misconduct and result in suspension and termination of employment, in accordance with relevant disciplinary procedures. In the case of a breach by other representatives, including contractors, this may constitute breach of contract and appropriate action may be taken. As appropriate, those operating on behalf of Practical Action will be referred to the relevant authorities for appropriate action, including criminal prosecution, in the abuser's country of origin as well as the host country.
- 8.8 Monitoring: Provide high level oversight of reports made and ensure appropriate action has been taken; record all complaints received and how they were dealt with. Regular reports of complaints received are provided to the Governance and People Committee of the Board. We will continually improve efforts to prevent and respond to harm, sexual exploitation and abuse.
- 8.9 Risk: We include safeguarding in our risk register and take steps to identify and manage risks.

## 9. Communications and Representation

- 9.1 Photographers, videographers and story gatherers will explain to the programme participant or child and the parent/guardian of the child and story gatherers will, whenever possible, explain to the programme participant or child;
- who will be taking a photograph or capturing video, audio or stories in any format.
  - the kind of purposes this content might be used for, including the channels it may appear on e.g. fundraising initiatives, digital or print media, etc.,
  - that the given consent can be withdrawn at any time, and
  - clear instructions regarding how they are able to withdraw consent should they choose to do so in future.
- No content will ever be used where permission has been refused or withdrawn.***
- 9.2 Personal and physical information about programme participants that could be used to identify their location within a country should only be used when it is safe to do so and after obtaining explicit permission from the individual(s) concerned. In cases where it is not safe to do so, first names only or invented personal names can be used. The immediate location where the subject(s) live(s) can be used where explicit and informed consent has been given.
- 9.3 Individuals or organisations requesting the use of third-party resources such as videos or photographs should be required to agree in writing with the agency as to the proper use of such materials.
- 9.4 Wherever possible, feedback should be provided to the subject(s) or their parent/guardian(s) by sending copies of the photos and case studies (if possible translated into an accessible language).
- 9.5 Information about a programme participant's life, including photographs of them, will be stored safely and in accordance with the current data protection policy.

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9.6 Consent should be obtained through a recorded conversation in a language fully understood by the participant and stored alongside the information, video and images of that person. If local laws require written signed consent, this should be captured in addition to the recorded consent.

For further details and information, please consult our content and consent policy which has been developed following the framework laid out in the BOND ethical storytelling guidelines:

[https://www.bond.org.uk/wp-content/uploads/2024/11/Digital\\_Ethical-Guidelines\\_FINAL.pdf](https://www.bond.org.uk/wp-content/uploads/2024/11/Digital_Ethical-Guidelines_FINAL.pdf)

## 10. Framework for Safeguarding in Communities

Practical Action has adopted a shared understanding of safeguarding allegation indicators and the relevant interventions to aid in identifying and determining necessary responses to a safeguarding concern.

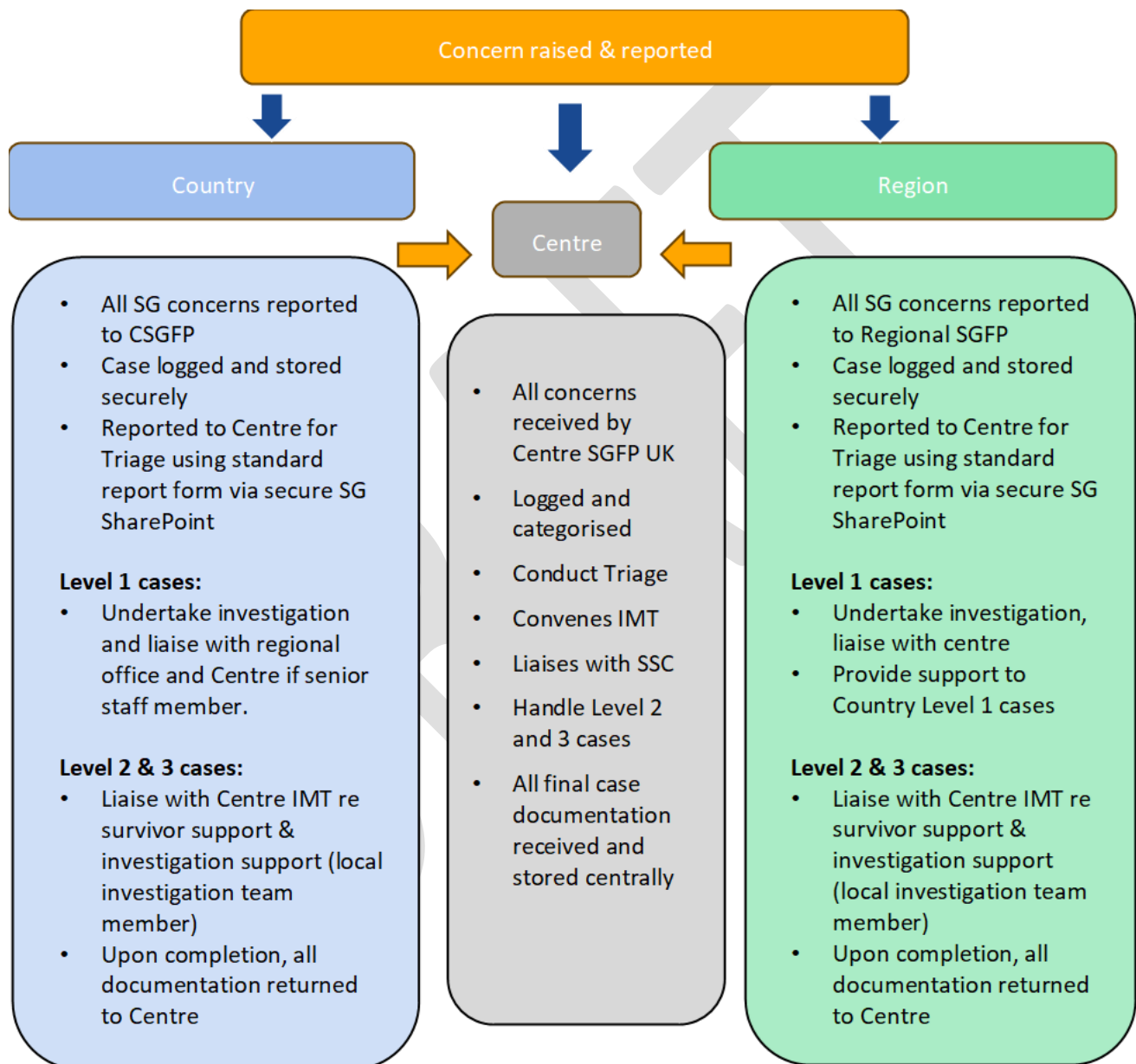
The various levels of safeguarding concerns and its responses have been represented in the following tables;

Level /Severity Allegation	Criteria of Allegation	Case Handled By	Reported To	Communicated To
Level 1 A	<ul style="list-style-type: none"><li>Reported concern <b>is not</b> prima facie crime.</li><li>Reported concern <b>does not</b> involve a child, programme participant or a vulnerable adult.</li><li>Reported concern <b>does not</b> involve alleged harm to staff.</li><li>Reported concern <b>does not</b> involve allegation against senior staff.</li><li>Reported concern <b>does involve</b> potentially a breach of SG Policy/CoC</li></ul>	Country Office	Centre	Region
Level 1 B	<ul style="list-style-type: none"><li>Reported concern <b>is not</b> a prima facie crime.</li><li>Reported concern <b>does not</b> involve a child, programme participant or a vulnerable adult.</li><li>Reported concern <b>does not</b> involve alleged harm to staff.</li><li>Reported concern <b>does</b> involve allegation against senior staff.</li><li>Reported concern <b>does involve</b> potentially a breach of SG Policy/CoC</li></ul>	Country Office	Centre	Region
Level 2	<ul style="list-style-type: none"><li>Reported concern is not a prima facie crime.</li><li>Reported concern does involve a child, programme participant, a vulnerable adult or staff.</li><li>Reported concern does involve allegation against senior staff.</li><li>Reported concern does involve potentially a breach of SG Policy/CoC.</li></ul>	Centre	Centre	Region



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<b>Level 3</b>	<ul style="list-style-type: none"> <li>Reported concern is a prima facie crime against a child, programme participant, a vulnerable adult or staff.</li> <li>Reported concern does involve senior staff.</li> <li>Reported concern does involve potentially a breach of SG Policy/CoC.</li> </ul>	Centre	Centre	Region
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**Safeguarding Standing Committee (SSC):** Practical Action will set up a *Standing Safeguarding Committee* comprised of high level and multi-disciplinary members that will consist of the following positions:

- Chief Operating Officer (COO)

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- Head of Internal Audit
- Representative from International Operations
- Group/Global Head of Learning & Development
- Group/Global Head of People and Culture
- At least one Regional Representative or Country Director

This Committee will meet quarterly intervals to provide guidance and oversight on:

- Policy development and implementation of safeguarding standards
- Risk management/risk registers and incident response
- Organizational training and accountability mechanisms
- Compliance with donor, legal and regulatory safeguarding obligations
- CSFP roles/turnover, nature and levels of reported concerns,
- Implementation of lessons learned (Management Implications Report - MIR).

The committee also delegates authority to **Investigation Management Team (IMT)** for investigations and liaise with IMT with regards to final decisions of investigations and in particular on decisions on referral (and non-referral) to police/law enforcement. This committee will also receive investigation case reports and management implications reports (MIR) and will report to the GAP committee on a regular basis on safeguarding.

**Investigation Management Team (IMT):** The investigation management team will consist of the following team members in each of the Region / Country Office. The IMT will develop a ToR for the case at hand and will be responsible for forming the Investigation Team (IT) and appointing an Investigation Manager (IM) for a particular case.

- Relevant Regional Director
- Relevant Regional Head of P&C
- Group/Global Head of P&C (at level 2 and level 3 cases)
- Group/Global Head of Learning & Development (at level 2 and level 3 cases)
- International Operations Manager
- Communications Crisis Management Team will form a member of the IMT on a need to basis.

The investigation team will mostly always consist of the Safeguarding Focal Person and the People and Culture Lead in addition to the nominated Investigation Manager and any other relevant persons appointed by the IMT. They will need to understand the local context and Practical Action's structure. The team will be highly confidential and consist of members that can provide expert input and be knowledgeable and sensitive towards EDIB principles. The team will need to record all details and manage safe storage of data. The team will submit their findings on a case and will document implications of investigation into a management implications report. The lessons learned investigation team will ensure that all lessons learned are documented and submitted to the IMT and that it is integrated into organizational learning to support any future cases.

**Safeguarding Focal Points:** The listed positions below are safeguarding focal points of the centre and Regions;

- Regional Head of P&C - Asia
- Regional Head of P&C – Africa
- Regional Head of P&C – Latin America
- Group/Global Head of P&C – UK and Centre

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- Group/Global Head of Learning & Engagement – UK and Centre
- Chief Operating Officer

All Country Offices have 2 safeguarding focal points (P&C and Programs) whose details are listed on the P&C homepage on SharePoint and should be displayed on posters throughout the offices with the details on reporting and raising a safeguarding concern.

## 11. Linked Practical Action Policies

### [Policies and commitments - Practical Action](#)

#### [UK Portal - NETconsent](#)

- Global Recruitment Policy
- Global Code of Conduct Policy
- Equality, Diversity, Inclusion and Belonging Policy
- Discipline Policy
- Global Complaints (Whistle Blowing) Policy
- Global Complaints Framework Policy
- Data Protection Policy

## 12. Further reading and resources

- Misconduct Disclosure Scheme [The Misconduct Disclosure Scheme](#)
- Unite Union [Practical Action & Unite](#)
- pA Employee Assistance Programme  
[practicalaction.sharepoint.com/sites/uk/Finance\\_Area/HR/SiteAssets/Forms/AllItems.aspx?id=/sites/uk/Finance\\_Area/HR/SiteAssets/SitePages/People-and-Culture/Employee\\_Assistance\\_Programme.pdf&parent=/sites/uk/Finance\\_Area/HR/SiteAssets/SitePages/People-and-Culture](https://practicalaction.sharepoint.com/sites/uk/Finance_Area/HR/SiteAssets/Forms/AllItems.aspx?id=/sites/uk/Finance_Area/HR/SiteAssets/SitePages/People-and-Culture/Employee_Assistance_Programme.pdf&parent=/sites/uk/Finance_Area/HR/SiteAssets/SitePages/People-and-Culture)
- UK Charity Commission [The Charity Commission - GOV.UK](#)
- [United Nations Convention on the Rights of the Child \(UNCRC\): how legislation underpins implementation in England - GOV.UK](#)
- BOND ethical storytelling guidelines: [https://www.bond.org.uk/wp-content/uploads/2024/11/Digital\\_Ethical-Guidelines\\_FINAL.pdf](https://www.bond.org.uk/wp-content/uploads/2024/11/Digital_Ethical-Guidelines_FINAL.pdf)

## Appendix

Appendix 1: Policy Declaration Form

Appendix 2: Self-Declaration Form

## Appendix 1: Policy Declaration Form

Please complete this form and send it to [ukpeopleandculture@practicalaction.org.uk](mailto:ukpeopleandculture@practicalaction.org.uk)

Employees who do not sign to accept this policy through NETconsent, and all other individuals acting on our behalf, are required to complete and return this form to your relevant contact at the time of appointment;

- ✓ I have read and understand the Safeguarding policy
- ✓ I agree to apply the Safeguarding policy in its entirety

Full name (print):

Signed:

Date:

## Appendix 2: Self-Declaration Form

Please complete this form and send it to [ukpeopleandculture@practicalaction.org.uk](mailto:ukpeopleandculture@practicalaction.org.uk)

In order to comply with the Practical Action Safeguarding Policy this form must be completed and signed by all employees at the time of appointment where a background clearance check is not available.

Full name (print):

Address (print):

Date of birth:

Place of birth:

1. Do you have any prosecutions pending or have you ever been charged or convicted of a criminal offence relating to the harm, exploitation or abuse of a child or adult?

YES / NO

If YES, please state the date(s) and nature of the offence:

Date of offence:

Nature of offence:

2. Have you ever been the subject of disciplinary procedures, or have left, or been asked to leave employment or voluntary activity due to inappropriate behaviour towards any individual?

YES / NO

If YES, please give details including date(s) below:

Name of employer:

Date of incident:

Nature of incident/inappropriate behaviour:

### Declaration:

I understand that, if it is found that I have withheld information or included false or misleading information above, I may be removed from my post whether paid or voluntary, without notice. I hereby declare that information provided above is accurate.

Signed:

Date: