

CBM Global Policy: Safeguarding of Children and Adults-at-Risk

June 2021



Purpose

The purpose of this safeguarding policy and its related procedures is to create an environment in which people, especially children, adults-at-risk and other programme participants are protected from any harm that may be caused because of their engagement with CBM Global's programmes, operations, and people. This includes abuse or neglect arising from:

- The conduct of CBM Global Staff (including Secretariat, Thematic Teams, Country Teams), Representatives (including consultants, contractors, board members, project visitors, interns, and volunteers), and Partners.
- Uncontrolled inherent risks in the design and implementation of CBM Global's programmes and activities.

This policy also ensures we consider the wellbeing of our staff and representatives and that they are protected while carrying out their responsibilities for and on behalf of CBM Global. It outlines the organisation's safeguarding commitments and informs staff and representatives on their safeguarding responsibilities.

All forms of abuse, including the threat of abuse, are covered under this policy except for Sexual Exploitation, Abuse and Harassment (SEAH) which are covered under the Protection from Sexual Exploitation, Abuse and Harassment policy.

Scope

This is a mandatory policy that applies to all CBM Global staff and representatives. It is also applicable to:

- **Partner organisations.** CBM Global expects partners to equally uphold high standards of safeguarding based on the UN Convention on the Rights of the Child and the UN Convention on the Rights of Persons with Disabilities. Partners are expected to have a robust policy in place that reflects good practice (at the minimum) on how they will prevent and respond to safeguarding complaints and concerns, and their duty of care toward programme participants, their staff, and volunteers (see Governance section for details). Where partners do not have a policy in place, there is a contractual requirement for them to adopt this policy for all CBM Global projects they are involved in. CBM Global will take steps to support partners in establishing the necessary policy and procedures.
- **CBM Global's Member Association representatives** engaged in or with CBM Global activity, other than instances when they are working in the Member country. Member Associations are invited to adopt the policy if they do not have a policy of a similar standard. They are requested to ensure that their existing policies align with this policy.

The policy applies both during and outside of contracted working hours, every day of the year. It will also apply under the following circumstances:

- Any safeguarding incident involving a CBM Global employee or representative.
- Any safeguarding incident in a project managed by a CBM Global entity (i.e., country office or directly by a Member Association or thematic team).
- Any safeguarding incident involving a Partner employee or representative in a CBM Global (funded) project.
- Any safeguarding incident in a project that is part or wholly funded by CBM Global (this includes CBM Global Member Associations).
- If a project is being managed by CBM International on behalf of CBM Global, CBM International must inform CBM Global, but the incident will be managed using CBM International's policy and procedure.

The policy does not cover:

- Safeguarding concerns in the wider community not perpetrated by CBM Global staff, representatives, or partners.
- Sexual Exploitation, Abuse and Harassment. These are dealt with under the CBM Global Protection from Sexual Exploitation, Abuse and Harassment Policy.
- Safeguarding incidents involving Member Association staff in their own countries
- Safeguarding incidents involving a Partner in non-CBM Global (funded) projects. However, Partners should notify CBM Global of any safeguarding incident involving their staff or volunteers on such projects and their planned responses.

Outline of the Policy

Safeguarding is an organization's obligation to take all reasonable steps to prevent harm occurring; to protect people, especially children and adults-at-risk, from that harm; and to respond appropriately when harm does occur. Safeguarding also includes CBM Global's duty of care to protect its staff and representatives from the risk of harm or abuse in the line of duty.

Policy Statement

At CBM Global, we believe that every child and adult have the right to be protected from all forms of harm, abuse, neglect, and exploitation, regardless of age, gender, sexuality, sexual orientation, religion, ethnic origin or whether they have a disability. It is our responsibility at CBM Global to make sure that all children and adults who engage with our advocacy, advisory work, development, and humanitarian field programmes are safeguarded to the greatest extent possible.

CBM Global has a zero tolerance toward all forms of abuse and takes seriously any safeguarding concern or allegation involving CBM Global staff, representatives, and partners.

This means that we will:

- Take proactive steps to prevent abuse, including child abuse, financial abuse, emotional or psychological abuse, neglect, physical abuse, and verbal abuse. Sexual abuse is covered in the PSEAH policy.

- Respond to every reported concern and where there is indication of a possible violation of this policy, a thorough investigation will be initiated, and appropriate disciplinary action taken as required.
- Hold all CBM Global staff and representatives up to the same standards and procedures, regardless of their position within the organization.

In this context, it means CBM Global will put in place systems and procedures to ensure that our staff, representatives, programmes and operations do no harm to children, adults-at-risk and programme participants; that we do not expose them to the risk of harm, abuse, neglect or discrimination; and that all safeguarding concerns or allegations raised in relation to CBM Global are appropriately responded to in a timely manner and reported to the appropriate authorities.

Safeguarding in humanitarian action

We recognize that humanitarian situations pose some of the highest risk for abuse, neglect, and exploitation. These risks are higher for girls, boys and women with disabilities, the elderly and other marginalised groups. Article 11 of the Convention on the Rights of Persons with Disabilities highlights the obligation to ensure the protection and safety of persons with disabilities in situations of risk, including armed conflict, humanitarian emergencies and natural disasters.

CBM Global will mainstream safeguarding in all stages of our humanitarian action – in the disaster preparedness phase, response, and early recovery, to fulfil our duty of care. This policy also includes the specific ways we will reduce safeguarding risks within our humanitarian work.

How to implement?

CBM Global commits to addressing safeguarding throughout its advocacy, advisory work, development, and humanitarian field programming activities using the three-pronged approach of prevention, reporting and response.

Prevention

- **Leadership.** Leadership is fundamental to prioritizing safeguarding and ensuring that it is sufficiently resourced and supported. CBM Global’s leadership – the Board, Executive Director and Directors – will provide high-level oversight and accountability, as well as always promote and uphold the organisation’s safeguarding principles and standards, serving as role models and advocates in their function.
- **Organisational culture.** CBM Global will create and sustain an organizational culture of openness and reporting. It will ensure a safe working environment that assures the respect and safety of everyone who works for and with CBM Global, including programme participants, partners as well as those in the communities where our programmes are delivered. CBM Global will establish trust in the communities where it works by robustly responding to safeguarding incidents, supporting victim-survivors, and holding those responsible for perpetuating acts of abuse accountable, thereby discouraging inappropriate behaviour and strengthening reporting.

- **Policies and systems.** CBM Global will develop, establish, and periodically review contextualized safeguarding policies, processes, and systems, to ensure safeguarding is well embedded across all levels within the organisation to sustain a safeguarding-conducive culture.
- **Safer recruitment.** CBM Global will have a rigorous recruitment and selection process in place to deter, identify and reject individuals who are deemed to be at risk of causing harm to children and vulnerable adults. This includes, but is not limited to, obtaining references, and conducting background / criminal record checks on potential new hires and including safeguarding responsibilities in every job role and job description, especially those with direct or indirect contact with children and adults-at-risk. CBM Global will also collaborate with wider interagency/sectorial initiatives, like the enhanced screening and information sharing mechanisms for new recruits - to the extent that it is relevant to its operations and legal boundaries - to improve its capacity to prevent, eliminate and respond to all types of abuse or threats of abuse in its work.
- **Safer programming.** CBM Global will adopt a risk-informed programming approach that ensures that our capacity to effectively prevent and respond to safeguarding incidents in a culturally sensitive manner is strengthened, and adequately resourced. Safeguarding risk assessments and planning will be carried out on all proposed project designs and proposals to proactively reduce inherent risks of harm or abuse posed to children, vulnerable adults, programme participants, staff, and representatives of CBM Global.
- **Partner assessment.** CBM Global will actively promote safeguarding to partners and require them to align with the safeguarding standards set out in this policy and its associated policies. Partnership safeguarding assessments will be an integral part of our due diligence process in partner selection. Initial assessments and reviews will be carried out in a collaborative and supportive manner with potential partners and existing ones respectively, to ensure their safeguarding practices are appropriate and adequate in terms of their operational size, required expertise and level of engagement on CBM Global projects.
- **Contracts.** CBM Global will ensure that all contractual agreements entered into with individuals and enterprises incorporate this global safeguarding policy; are clear about CBM Global's safeguarding obligations as a development and humanitarian agency, and its expectation that contracting parties will abide by and uphold CBM Global's safeguarding principles and standards; articulate that a breach of the policy - by failing to adequately prevent or respond to concerns of harm, including investigating reported incidents - will constitute grounds for the termination of their contracts with CBM Global. In consortium arrangements, CBM Global commits to work collaboratively with other consortium members to develop and implement a safeguarding framework in the best interest of the vulnerable groups, including children and adults-at-risk, within the target population.
- **Communication.** CBM Global will actively, on a regular basis, communicate its global safeguarding policy and associated policies to all stakeholders, including the Board, staff, interns, volunteers, partners, programme participants, service providers and community

members. Awareness will be raised across the organization and the communities where projects are carried out, about what constitutes appropriate behaviour for CBM Global staff and representatives, and how to identify and report inappropriate behaviour using safe, confidential, and accessible complaints mechanisms. Care will be taken to ensure that communication materials and media outlets are diverse, inclusive, and appropriate for the intended audience. The global safeguarding policy and other necessary guidance documents will be translated into local languages, illustrated in child-friendly and culturally sensitive formats. Appropriate language will be used so that young children and non-literate persons can easily understand. The policies will also be made available in accessible formats, such as clear print, easy read etc.

- **Research, Media, and social media.** CBM Global will follow ethical and protective principles to ensure that children and adults are represented in a dignified way, that their participation is not exploitative, and that people and organisations do not use photographs and related information beyond the agreed purposes and consent. CBM Global's guidelines on Use of Media, social media and other relevant policies will apply.
- **Training.** CBM Global will ensure that all members of the Board, staff and representatives regularly receive appropriate safeguarding briefing, training, and refresher courses relevant to their roles, responsibilities, the thematic programmes they are involved in and the nature of their engagement with children, adults-at-risk, and programme participants. Mandatory safeguarding training and briefing such as inductions for new hires will be available for all levels of staff, interns, volunteers, and Board members. Advanced safeguarding training will be available for roles that pose medium to high risk levels, such as programme managers, country safeguarding focal points, project officers, HR, and recruitment officers etc.
- **Humanitarian action.** CBM Global will reduce safeguarding risks by implementing the three levels of response within stipulated guidelines.
 - a. Level 3. The Country Director or Humanitarian Director will appoint a Safeguarding Focal Person and incident management team among the Humanitarian team for all Level 3 (L3) engagements. The Humanitarian Team will report to the Emergency Management Team set up for all L3 responses, providing strategic oversight and overall management support.

The Humanitarian Director will ensure and transfer these expectations to partners' leadership: Safeguarding risk assessments are incorporated into humanitarian programme design, budgeting and operational processes like surge capacity recruitment and partner selection; safer recruitment practices and partner safeguarding assessments guidelines are not compromised.
 - b. Level 1 and 2. The Country Director will provide leadership and support to the local safeguarding focal person and safeguarding committee to ensure the expectations transferred to partners' leadership are met.
 - c. All levels. All new representatives of CBM Global and partners involved in humanitarian response will receive a safeguarding briefing as early as possible in the response phase while existing staff will receive a refresher briefing at the beginning

of response; all other programming safeguarding requirements contained in this policy apply in humanitarian response and must be adhered to.

Reporting

CBM Global will ensure there are safe and appropriate multiple pathways in place to report safeguarding concerns for staff, programme participants, partners, and members of the public.

- CBM Global will work with partners to ensure they develop and establish community-based reporting mechanisms in consultation with project communities. This way, reporting barriers are identified and reporting systems designed to be accessible, confidential, safe and age- as well as culturally- appropriate.
- Information on safeguarding will be made widely available in a variety of accessible formats at all CBM Global offices. Likewise, partners will ensure their safeguarding policies and reporting systems are communicated and readily accessible in all communities where they work. This way, people are clear on what to report, how to report, whom to report to and what actions they can expect CBM Global to take once an incident is reported.
- CBM Global will ensure that people who report understand that whatever information they share will be treated confidentially and that every possible effort will be made to protect them from reprisals.
- Frontline staff, safeguarding focal points and others who receive complaints will be trained and supported to carry out their duties in a professional, non-judgmental, and culturally sensitive manner, with due regard for confidentiality and data protection requirements.
- CBM Global **does not require** proof or evidence from persons raising safeguarding concerns or complaints. Any person can raise a concern or complaint they have heard about, witnessed, or experienced relating to a CBM Global staff, representative or partner without fear of reprisal.
- CBM Global staff and representatives **must not** conduct investigations on their own; their duty is to report to a safeguarding focal point or a senior team member.

CBM Global staff, representatives, programme participants, partners and community members can report, in writing or verbally, suspected or confirmed cases of safeguarding and abuse through any one of these established pathways:

1. Notify, in writing or verbally (face-to-face or by telephone), the nearest Safeguarding Focal Point, HR officer, Project officer or member of your country senior management team.
2. Notify CBM Global's Global Safeguarding Manager at safeguarding@cbm-global.org
3. Report using the anonymous whistle-blower address: whistleblowing@cbm-global.org or use CBM Global's public website at: www.cbm-global.org

CBM Global recognizes that sometimes, persons who wish to report a safeguarding concern may feel more comfortable doing so outside these identified pathways. For instance, a staff member may make a report to a trusted colleague and not a safeguarding focal point. The trusted colleague has an obligation to escalate the incident using any of the reporting

pathways listed above. All reported cases, regardless of how they are reported, will be treated seriously.

Responding to safeguarding complaints

CBM Global considers victim-blaming unacceptable and will make sure all reported safeguarding concerns and complaints are taken seriously and addressed in a timely and professional manner, using the survivor-centred approach to ensure the safety and well-being of victim-survivors, and that their dignity and human rights are upheld throughout the process. A comprehensive and agile incident management system will be consistently maintained across the organization, with consideration for local statutory and legal requirements. CBM Global will provide appropriate support to victim-survivors of abuse – including child abuse- perpetrated by CBM Global staff and representatives. This will include medical care, psychosocial support, and legal assistance. All staff and representatives will be able to access the organisation's Employee Assistance Programme (EAP) and details can be obtained through the country HR or Safeguarding Focal Point.

- All reported incidents will be officially acknowledged within 48 hours of receiving the complaint and the country Safeguarding Focal Point will initiate the Safeguarding Committee to assess the case to determine next steps and whether further investigation is required. Relevant Member Associations and Donors will be notified of any an incident that occurs in their project, based on agreed terms, and receive updates throughout the case management cycle.
- CBM Global will prioritize victim-survivor support, ensuring that the support provided is timely, appropriate with consideration for culture, gender, and religion, and delivered by qualified professionals. We will put survivors at the centre of our decision-making process by keeping them informed and consulted on matters that affect them. Appropriate support and care will also be provided to the Subject of Complaint and witnesses to ensure the wellbeing of everyone involved.
- All investigations will be risk assessed with consideration for the safety of all individuals involved and delivered in a timely and professional manner by qualified investigators guided by a case-specific Terms of Reference.
- CBM Global will employ a survivor-centred approach to decisively implement risk-assessed recommendations from investigations and disciplinary hearing findings.
- The outcome of investigations and disciplinary hearings will be shared on a need-to-know basis with relevant parties. Donors and regulatory agencies where necessary will also be notified.
- CBM Global will maintain a versatile case management database that is secure and confidential, to ensure quality assurance, accountability, and data protection compliance.
- CBM Global will maintain a learning posture by putting in place systems to review the management of safeguarding incidents. Learnings will be used to revise and improve existing processes and policies.

Governance and Accountability

Policy review

This policy will be reviewed annually to ensure it is up to date and reflective of any changes that may have occurred with regards to CBM Global's activities or legal, regulatory and/or sectorial safeguarding standards.

Policy Adaptation

While this is a global policy, where necessary, the policy and its appendices can be contextualised by CBM Global Country Offices to fit the local legal and cultural context, without diluting it. Any adaptations besides language translations will be in consultation with the Global Safeguarding Manager, who will facilitate internal mechanisms for approval of the adaptations.

Policy implementation reporting

The Global Safeguarding Manager will submit an annual report to the Secretariat Executive Team and Board, on implementation progress across the organisation, safeguarding concerns and developments within the year.

Country Offices will develop a three-year Safeguarding action plan that is reviewed and submitted to the Global Safeguarding Manager annually. The annual review ensures the policy is updated with relevant learning from the year's treated cases and significant changes that may have occurred in the project or country.

Roles and Responsibilities

At CBM Global, we believe safeguarding is everyone's responsibility.

A breach of this policy or any of its associated policies may constitute gross misconduct resulting in disciplinary actions against individuals, and for organisations, termination of contracts and/or funding.

All CBM Global Staff and representatives

- Have a responsibility to uphold CBM Global's Safeguarding Policy and its associated policies, including the Code of Conduct. They must read and sign a copy of this policy on taking up their work assignment at CBM Global or any of its entities.
- Have a mandatory obligation to prevent, report and respond to all forms of abuse, including child abuse.
- Must know and consider the power they (CBM Global staff) hold because of their position at CBM Global and take care not to abuse it by treating everyone with respect.
- Must actively seek the support and guidance of a senior colleague when i) unsure of what to do after witnessing an incident or behaviour that does not seem right, or ii) uncertain about whether what they witnessed is a safeguarding issue.
- Must not seek to retaliate against complainants, victim-survivors and witnesses involved in a safeguarding incident.

Country Safeguarding Focal Points

- Provide support to Country Office programmes to prevent and respond to safeguarding incidents and concerns.

- Escalate incident reports appropriately and seek additional support as needed when managing incidents.
- Raise awareness and promote best practices in safeguarding through trainings, briefings and regular communication with in-country teams and stakeholders.

Managers

- Promote a culture of respect and inclusion to help prevent abuse, including child abuse, by providing a safe work environment where staff trust the reporting systems and know their concerns will be treated seriously and appropriate action is taken.
- Ensure line reports understand their mandatory duty to report any safeguarding concern they become aware of or suspect.
- Ensure due diligence checks on potential hires to prevent recruitment of offenders.
- Ensure safeguarding elements are in job descriptions, interview adverts, interview questions and assessments.

Programme Teams

- Collaborate with relevant colleagues to complete or/and ensure completion of, and subsequently review/update, all safeguarding risk assessments i.e., country context analysis, partnership safeguarding assessments and project safeguarding risk assessments.
- Assess inherent safeguarding risks in proposed project activities, programme participants engagement and location context, and build in sufficient protection, prevention, reporting and response mechanisms to address identified risks.
- Analyse the safeguarding roles, capacities, processes, and activities required to effectively support projects and allocate resources appropriately in budgets.
- Ensure CBM Global's safeguarding obligations, expectations and considerations are fully embedded and costed in bid proposals, concept notes and other project development activities and communication.
- Support and monitor partner organisations' safeguarding obligations and commitments to ensure they are met and are consistently in alignment with CBM Global's policy.

Partner organisations

CBM Global expects its partners to either have, or to develop within an agreed timeframe, a safeguarding policy, which is in line with the UN Convention on the Rights of the Child⁷ and the UN Convention on the Rights of Persons with Disabilities. Partners will only be required to adopt the CBM Global safeguarding policy if they do not have a policy in place, or their existing policy is inadequate.

- Have a safeguarding framework that clearly communicates the organisation's safeguarding commitment, how it will prevent and respond to safeguarding concerns and how programme participants and stakeholders can report.
- Design and establish in consultation with programme participants and community leaders, a safe, accessible, culturally appropriate, confidential community-based reporting mechanisms.
- Report all safeguarding incidents related to CBM Global funded projects promptly to the Country Programme Manager, Safeguarding Focal Point, or senior member of the country team.

- Support country Programme team to carry out safeguarding risk assessments and map victim-survivor support services and referral pathways in the community/region.
- Provide appropriate training and briefing for staff, programme participants and community members to raise awareness on safeguarding, and how to identify and report concerns safely and confidentially.

Country Directors

- Be accountable for safeguarding and the implementation of a contextualised safeguarding policy in-country.
- Ensure all safeguarding risk assessments for projects and partners are completed on time and appropriate budget allocations made to carry out mitigation action plans.
- Support safeguarding focal points and committees to effectively carry out their roles.
- Ensure appropriate and competent survivor support services are researched and made available in-country.
- Ensure that complaints handling, and investigation procedures are established, along with appropriate disciplinary procedures where required.
- Ensure timely submission of all country safeguarding data and reports.

Secretariat Executive Team

The Executive Director and Directors are accountable to the Board for the implementation of the Global Safeguarding Policy across the organisation. They will:

- Stay informed and knowledgeable about the organisation's progress on safeguarding against sectorial standards and legal obligations.
- Check that CBM Global's safeguarding policy and procedures are fit for purpose and up to date.
- Ensure all CBM Global staff and representatives are aware of their safeguarding responsibilities and know how to report and respond to concerns.
- Ensure partners and others funded by CBM Global have adequate safeguarding policies and procedures in place.
- Ensure reported incidents are taken seriously and managed effectively with openness and transparency, and records stored securely.
- Ensure the safeguarding agenda and action plans are adequately resourced and budgeted for.
- Report serious safeguarding incidents to Regulatory bodies.

Board Safeguarding lead

- Champion safeguarding throughout CBM Global.
- Support the Board to develop their individual and collective understanding of safeguarding.
- Ensure the annual review of safeguarding policies and procedures, and that these are presented to the Board.
- Ensure the organisational strategic plan reflects statutory and sectorial safeguarding standards specific to CBM Global's activities.
- Work regularly with the Executive Director and Global Safeguarding Manager to review CBM Global's safeguarding practices, to ensure they are creating a safer culture and work environment that keep people safe.
- Work with the Executive Director, Global Safeguarding Manager and Communications team to manage all serious safeguarding incidents.

Board of Directors

The Board is ultimately accountable for the Global Safeguarding Policy. Key responsibilities for board members include:

- Review and approve safeguarding policy.
- Appoint a Safeguarding-PSEAH Lead on the Board and support the role.
- Hold the Secretariat Executive team to account to implement the safeguarding policy with diligence.
- Receive and review safeguarding reports on a regular basis.

Key References and Supporting Documents

- CBM Global Code of Conduct
- CBM Global Policy on the Protection from Sexual Exploitation, Abuse and Harassment
- Safeguarding - PSEAH incident management process and flowchart
- CBM Global Whistleblowing Policy

CBM Global Disability Inclusion

hello@cbm-global.org www.cbm-global.org

+49 (0)6201 472320

Dr.-Werner-Freyberg-Str. 7, 69514 Laudenberg, Germany