

SAFEGUARDING BRIEFING NOTE FOR IMC PARTNERS

Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur.

IMC and our partners must have a zero-tolerance stance on exploitative and abusive relationships. Protection from sexual exploitation and abuse (PSEA) and child protection come under this umbrella term.

As safeguarding means taking all reasonable steps to prevent harm, it applies consistently and without exception across our programmes, partners and employees. This means IMC must work closely with our partners to achieve this. Together we must proactively identify, prevent and guard against all risks of harm, exploitation and abuse and have mature, accountable and transparent systems for response, reporting and learning when risks materialise (including between organisations).

Systems must take all steps to put the needs of the survivor first (be survivor-centred) and also protect those accused until proven guilty.

Survivor – the person who is, or has been, sexually exploited, sexually abused or harassed. The term ‘survivor’ implies strength, resilience and the capacity to survive.

A Glossary is included at the end of this document.

IMC’s Safeguarding Policy can be found [here](#) and it explains our approach to safeguarding with our organisation and our programmes.

Safeguarding is an important issue for IMC. IMC recently carried out a comprehensive review of our safeguarding measures and have developed this Briefing Note to outline our understanding of the issues and how we want to work collaboratively with our partner organisations to ensure that we have robust safeguarding measures throughout our operations.

Although relevant to all of our work, safeguarding is now explicitly mentioned in DFID’s Terms and Conditions of Contract¹ and the Supplier Partner Code of Conduct². If a contract is for the UK Government, there will be specific contract clauses that the programme has to meet. It is critical not only to consider our corporate approach but also the design of appropriate safeguarding measures on programmes. It is also important to consider how to evidence a safeguarding approach on programmes.

¹ Terms and Conditions

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/734154/Standard-Terms-Conditions-of-Contract-15August.pdf

² Code of Conduct Guidance -

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739915/Supplier-Partner-Handbook-Sep18.pdf

1 BIDDING AND PROGRAMME IMPLEMENTATION

It is important that we, and our partners consider safeguarding requirements at the bid stage and throughout programme mobilisation, inception and implementation.

Bid stage

Safeguarding measures should be considered at the bid stage. This is the best opportunity to have early conversations with other partners and IMC about risks associated with the planned approach to the programme and risks that exist in the wider supply chain.

Here we must plan for mitigating actions and include resources in our proposals.

All partners and IMC must be clear about responsibilities and expectations.

Live Programmes

The safeguarding framework should also be used to consider the provisions on programmes that are already in inception or implementation.

For programmes already underway, the safeguarding framework may be a helpful reference to check for any gaps.

2 IMC'S SAFEGUARDING FRAMEWORK

IMC's Safeguarding Framework is based on the three pillars of **Prevention, Reporting, Response**. As such this section describes our procedures under each of these pillars.



Figure 1 - IMC Safeguarding Framework

The table overleaf is an overview of safeguarding considerations within the framework. More detailed considerations are set out in the table in section 3.

Table 1 - Overview of IMC's Safeguarding Framework

Aspect of the framework		
Prevention	Accountability & Governance	Identifying clear management lines and accountability for safeguarding (corporate and programme level). Designing and implementing safe programmes. Creating an organisational culture conducive to safeguarding.
	Recruitment & Induction	Having rigorous recruitment and selection procedures in place.
	Communication & Training	Considering ways to communicate with all those concerned. Considering the training requirement.
	Working with Partners	Consider the expectations of our partners and how we can support them.
Reporting	Complaints & reporting Mechanisms	Designing and putting in place safe, appropriate pathways for beneficiaries and communities to report concerns.
	Making a Report	Sharing clear instructions on how to report. Making sure we repeat communications to those wishing to make a report and provide guidance for those who are unsure.
	Receiving a Report	Making available clear guidance on what to do if you receive a report.
Response	Dealing with a Report	Responding to reports in a timely manner. Considering the needs of those involved and don't take anything for granted (e.g. what the survivor wants)
	Incident Investigation Procedure	Carrying out a risk assessment to those involved as a priority. Following due process when we need to investigate a report.
	Decision & Close	Consistently reviewing cases that come to light and taking appropriate disciplinary measures where appropriate and relevant. Taking appropriate legal steps when required.

3 RECOMMENDED NEXT STEPS

1. Review the safeguarding framework details set out in table 2.
2. Spend time considering the safeguarding risks, document these.
3. Map out what applying the safeguarding framework means in the context of the programme.
4. Develop an action plan for putting measures in place, including timescales and people responsible.
5. Assign responsibility for monitoring the action plan.
6. Assign responsibility for reviewing the safeguarding framework.

3.1 NEED SOME MORE HELP?



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Table 2 - Considerations for Programmes against the Safeguarding Framework

Aspect of the framework		Considerations for programmes (Bids / Live jobs)
Prevention	Accountability & Governance	<p>Identifying clear management lines and accountability for safeguarding (corporate and programme level). Designing and implementing safe programmes. Creating an organisational culture conducive to safeguarding.</p> <p>Who will be responsible for safeguarding at the local level for the programme? Consider cultural challenges - who is approachable? Who is available to take action? Do you need multiple points of contact? Consider different project locations.</p> <p>What are the safeguarding risks inherent in the programme? Are there any changes to the design of the programme that can minimise or avoid these risks? Think about where people are and who we are coming into contact with. What mitigation can be put in place? Assess and monitor the risk.</p> <p>safeguarding must be taken seriously. The Programme Management team must lead on promoting IMC's safeguarding measures, monitoring their effectiveness and responding to reports.</p>
	Recruitment & Induction	<p>Having rigorous recruitment and selection procedures in place.</p> <p>Recruitment on the project should look to share IMC's stance on safeguarding at all stages of the process (Job description shares the Policy, interview questions, due diligence, references). Programme Inductions should include an opportunity to discuss the Policy, meet key contacts and ask questions.</p>
	Communication & Training	<p>Considering ways to communicate with all those concerned. Considering the training requirement.</p> <p>Communication needs to be considered carefully. Who are the stakeholders that need to know about IMC's safeguarding measures? – policy, reporting procedures and response to reports.</p> <p>This may be our direct programme team (including partner staff or partner independent consultants), the communities that we work in, or the client's people.</p> <p>The best way to communicate with different stakeholders may vary. This must be considered and mapped out. Resources should be allocated to communication and training. Prioritise high-risk areas. Consider language or technology barriers. This should be an ongoing process where key messages are repeated.</p>

	<p>Working with Partners</p>	<p>Consider the expectations of our partners and how we can support them.</p>	<p>There is an expectation that our partners consider safeguarding risks in their organisations and in the supply chain. First, we must work with our partners to make sure that safeguarding issues are understood. We must work together to put in place mitigating measures across the programme. Training and communication of programme personnel needs to be joint effort.</p> <p>Prohibited behaviour (Policy) must be understood across the supply chain. We need to think about how we can support our partners in making sure this happens?</p>
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Reporting</p>	<p>Complaints & reporting Mechanisms</p>	<p>Designing and putting in place safe, appropriate pathways for beneficiaries and communities to report concerns.</p>	<p>Consider the different groups of people that come in contact with our Programme Personnel. How might these groups feel most comfortable reporting to IMC? To someone senior on the Programme? Their line manager? To another party? To the whistleblowing service? If someone has a complaint – who should they go to?</p> <p>Make sure there are different options available for people who would want to make a report.</p> <p>Make sure there are resources available to support these reporting mechanisms so that we respond when a report is made.</p>
	<p>Making a Report</p>	<p>Sharing clear instructions on how to report.</p> <p>Making sure we repeat communications to those wishing to make a report and provide guidance for those who are unsure.</p>	<p>Reporting mechanisms may take different forms.</p> <p>Communicate the reporting mechanism broadly and repeat the communication.</p> <p>Consider the different audiences and their communication needs.</p> <p>Think about where people might reach out to for guidance. What can we provide that is easy to access?</p> <p>Think about posters, websites, business cards, programme documentation</p>
	<p>Receiving a Report</p>	<p>Making available clear guidance on what to do if you receive a report.</p>	<p>We cannot control how we will receive reports. Anyone on the Programme could receive a report. Include ‘receiving a report’ in the communication and training related to reporting.</p> <p>Simple Dos and Don’ts should be clearly stated. See later in this report.</p> <p>Where can the guidance be saved/presented so that people know where to find it? We should repeat this message regularly. We need to clearly articulate what someone receiving a report should do next.</p> <p>Confidentiality is very important so that more harm isn’t done inadvertently.</p>

Dealing with a Report	<p>Responding to reports in a timely manner.</p> <p>Considering the needs of those involved and don't take anything for granted (e.g. what the survivor wants)</p>	<p>All reports must be taken seriously and responded to in a timely manner. A clear record of the report must be kept and the outcome. IMC's procedures outline the steps required to assess a report and decide on next steps.</p> <p>This may or may not be that an investigation is needed.</p> <p>Make sure that the Programme Operation Manual (POM) stipulates who reports should be referred to and what happens next.</p>
Incident Investigation Procedure	<p>Carrying out a risk assessment to those involved as a priority.</p> <p>Following due process when we need to investigate a report.</p>	<p>Following our procedures after a report is made, may result in IMC deciding to investigate an incident.</p> <p>In which case, the investigation procedures will be followed by the Safeguarding Manager supported as appropriate by the local safeguarding lead.</p> <p>Cases involving children, or suspected to involve children, will be referred to relevant external experts.</p> <p>Investigations will include risk assessments regarding the people involved and the approach to the investigation.</p> <p>A plan will be made, and the investigation team shall work independently from the decision maker for the case.</p> <p>The investigation team's involvement ends when the investigation is concluded.</p>
Decision & Close	<p>Consistently reviewing cases that come to light and taking appropriate disciplinary measures where appropriate and relevant.</p> <p>Taking appropriate legal steps when required.</p>	<p>The investigation report is then picked up by the decision maker to decide an outcome.</p> <p>Any follow up action is then the responsibility of the relevant person at IMC.</p> <p>If there is a grievance issue then this is then escalated within IMC.</p>

4 RECEIVING A REPORT

Reports can reach the organisation through various routes. This may be in a structured format such as a letter, e-mail, or text. It may also be in the form of informal conversation or rumour. If someone hears something in an informal conversation or chat that they think is a safeguarding concern, they should report this to the appropriate member of the team.

If a safeguarding concern is disclosed directly to programme personnel, the person receiving the report should bear the following in mind:

DO:

- Listen
- Let them know that you have a responsibility to pass on the report confidentially
- Empathise with the person
- Ask who, when, where, what but not why
- Repeat/check your understanding of the situation
- Tell the person what you will do next

DO NOT

- Become defensive
- Argue with the person
- Be dismissive
- Blame others
- Make assumptions without knowing the facts
- Make promises you can't keep
- Ignore the problem
- Try to investigate yourself

The table below shows the sort of information that you may wish to gather.

Date and time of report:	
Report recorded by:	
Name of person making the report to you:	
Name(s) of alleged victims/survivors of safeguarding incident(s) if different from the above	
Name(s) of alleged perpetrator(s):	
Name(s) of any witnesses:	
Description of incident:	
Date(s), time(s) and location(s) of incident(s):	
Names of other people present at the time of the incident if known:	

Due to the sensitive nature of safeguarding concerns, confidentiality must be maintained during all stages of the reporting process, and information shared on a limited 'need to know' basis only. **The person receiving the report should then forward this information in writing to the local safeguarding lead or the UK Safeguarding Manager within 24 hours.**

5 GLOSSARY

Associated personnel - anyone engaged with work or visits related to IMC, including but not limited to the following: independent consultants; contractors' employees; contractors' independent consultants; programme visitors including client representatives, journalists, celebrities and politicians.

Allegation – an assertion of facts that one intends to prove at trial or during an internal investigation procedure.

Beneficiary – someone in receipt of assistance. Alternatively referred to as a member of the affected population, person we seek to assist, person affected by crisis or rights holders.

Case management – following the appropriate policies and procedures to determine the outcome of a report of SEA.

Child – any individual under the age of 18, irrespective of local country definitions of when a child reaches adulthood.

Child protection – preventing and responding to violence, exploitation and abuse against children – including [but not limited to] commercial sexual exploitation, trafficking, child labour and harmful traditional practices.

Code of conduct – a set of standards about behaviour that staff of an organisation are obliged to adhere to.

Complaint – specific grievance of anyone who has been negatively affected by an organisation's action or who believes that an organisation has failed to meet a stated commitment.

Complainant – the person making the complaint, including the alleged survivor of the sexual exploitation and abuse or another person who becomes aware of the wrongdoing.

Complaint mechanism or procedure – processes that allow individuals to report concerns such as breaches of organisational policies or codes of conduct. Elements of a complaints mechanism may include suggestion boxes, whistleblowing policies and designated focal points.

Confidentiality – an ethical principle that restricts access to and dissemination of information. In investigations on sexual exploitation, abuse, fraud and corruption, it requires that information is available only to a limited number of authorised people for the purpose of concluding the investigation. Confidentiality helps create an environment in which witnesses are more willing to recount their versions of events and builds trust in the system and in the organisation.

Feedback – the information sent to an entity (individual or a group) about its prior behaviour so that the entity may adjust its current and future behaviour to achieve the desired result.

Focal point – a person designated to receive complaints of cases of sexual exploitation and abuse.

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

Investigation of sexual exploitation or abuse – an internal administrative procedure, in which an organisation attempts to establish whether there has been a breach of SEA policy by a staff member or members.

PSEA (Protection from sexual Exploitation and Abuse) – the term used by the UN and NGO community to refer to measures taken to protect vulnerable people from sexual exploitation and abuse by their own staff and associated personnel.

Report – where an individual or individuals report a concern regarding SEA.

Safeguarding - Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur. **IMC has a zero-tolerance stand on exploitative and abusive relationships.** PSEA and child protection come under this umbrella term.

Safeguarding applies consistently and without exception across our programmes, partners and employees. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialise. Those systems must be survivor-centred and also protect those accused until proven guilty.

Sexual abuse – an actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual exploitation – 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.

Survivor or victim – the person who is, or has been, sexually exploited or abused. The term ‘survivor’ implies strength, resilience and the capacity to survive. This document mostly uses the term ‘victim’, to mean the victim of the alleged perpetrator’s actions. However, this is not intended to negate that person’s dignity and agency as an individual.

Whistleblowing Policy – an organisational policy which encourages staff members to report concerns or suspicions of misconduct by colleagues. Whistleblowers are protected from any negative consequences of reporting these concerns.