

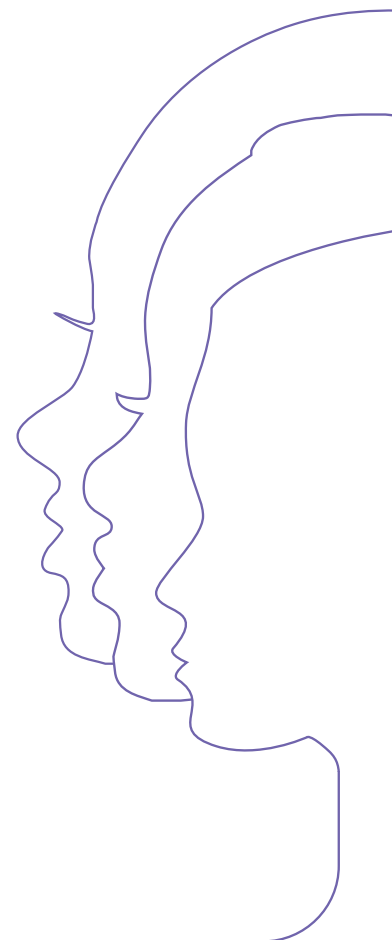


# WOSSO POLICY: SAFEGUARDING AGAINST ABUSE, SEXUAL EXPLOITATION, SEXUAL HARASSMENT AND BULLYING

## 1 Introduction

Women of the South Speak Out (WOSSO) is made of a consortium of organisations, who will work to ensure the voices of women and girls from the global south, in all their diversity, inform the decisions and policies that affect our lives. WOSSO will support and facilitate women's rights organisations and women leaders, to ensure their meaningful engagement in key advocacy meetings and share evidence. WOSSO is led by Gender Links, working with Arrow and MannionDaniels.

**The purpose of this policy** is to clearly lay out what safeguarding means and to define our responsibilities as WOSSO management, the responsibilities of all associated parties of WOSSO, and outlines processes and procedures of reporting and investigations. This policy was developed based on the safeguarding policy of all three consortium organisations, and knowledge about the WOSSO program. This safeguarding policy aims to set our standards of maintaining a safe environment for all WOSSO associated parties in which to work. This policy is closely linked to the Code of Conduct, which defines how we expect all associated parties to interact and behave. The values on which our policies and partnerships are indeed based stem from a place of courtesy and respect for all.



WOSSO is a consortium between



Funded by



This policy is relevant for all those working on the WOSSO team - so all associated parties including WOSSO team comprising of Gender Links, Arrow and MannionDaniels staff, consultants, members of the WOSSO Independent Advisory Committee and other WOSSO volunteers, consultants, suppliers and authorised representatives. This policy also applies to WOSSO advocates (WOSSO Fellows) whilst they are working for and/or representing WOSSO.

WOSSO recognises that harm can come as a result of **power imbalances**. These can happen between work colleagues, including team members, advocates who work with WOSSO, donor partners and other stakeholders. WOSSO colleagues should also recognise their own relative position of power in working relationships with advocates (WOSSO Fellows) who they support. At all times, we ask for humility and appreciation of the power we hold over others, so we can maintain a safe working environment based on courtesy and respect.

WOSSO has a strict policy against all forms of abuse, including sexual exploitation, harassment, and bullying. WOSSO defines 'abuse' as any form of child or adult abuse.

**Forms of abuse** include but are not limited to:

- **Physical abuse:** including hitting, slapping, punching, burning, misuse of medication, inappropriate restraint.
- **Sexual abuse:** including rape, indecent assault, inappropriate touching, exposure to pornographic material.
- **Psychological or emotional abuse:** including belittling, name calling, threats of harm, intimidation, isolation, bullying, victimisation
- **Financial or material abuse:** including stealing, selling assets, fraud, misuse or misappropriation of property, possessions or benefits; exchanging financial transactions for benefits.
- **Neglect and acts of omission:** including withholding the necessities of life such as

medication, food or warmth, ignoring medical or physical care needs.

- **Discriminatory abuse:** including racist, sexist, that based on a person's age, disability, gender identity, and other forms of harassment, slurs or similar treatment.
- **Institutional or organisational:** including regimented routines and cultures, unsafe practices, lack of person-centred care or treatment.
- **Bullying:** Bullying and harassment is behaviour that makes someone feel intimidated or offended. Bullying usually involves repeated incidents/patterns of behaviour that assert power through aggression. Bullying can also be the aggregation of micro-aggressions over time (these are offhand comments, painful jokes, that demean a person and discriminate against them). Any such micro-aggressions will be documented for the record by the person making the allegation and must be substantiated by solid evidence. Please note that constructive feedback is not considered bullying if done in a positive and kind manner, and with the underlying intent to improve work and support the individual/organisation in question.

## 2 What safeguarding means

**Safeguarding means keeping people safe from harm.** It involves setting policies and practice to keep all individuals, and especially those with vulnerabilities, safe. Vulnerabilities can be defined as any aspects that result in power imbalances e.g. People living with disabilities, younger people or children, under 18 years of age, elderly sick people who need caregivers) It also involves creating an environment where all associated parties feel safe and supported in their professional relationships and within their professional environments. Safeguarding for us at WOSSO is more than a compliance exercise - it is a culture and practice, and fits with our broader human rights approach, feminist values, respect to intersectionality and diversity, ethical values of integrity, and includes non-

discrimination, inclusion and our broader work on gender equity and sexual and reproductive health and rights.

The legal **framework** in which our organisations are registered (Gender Links in South Africa, Arrow in Malaysia, and MannionDaniels in the UK) also guide our investigations and processes. This safeguarding policy is linked to the WOSSO travel policy, and the IT policy, the fraud policy and the HR policy of each of the organisations as well.

**All WOSSO associated parties commit to behaving professionally and ethically at all times when working for and/or representing WOSSO.** We are each responsible for upholding our individual standards of conduct and ethics, making decisions with integrity, doing the right thing, supporting each other with respect and courtesy, and reporting potential issues. The key to maintaining a healthy work environment is for everyone - individually - to take action to ensure we are adhering to our values.

As a Consortium, WOSSO undertakes to be responsible for ensuring there is a

safeguarding policy to guide all WOSSO staff on definitions of individual safeguarding responsibilities and behaviour expected, training staff on this, and then holding people to account in case of allegations.

In addition to the code of conduct, WOSSO has some specific behaviour codes around sexual behaviour and modern slavery, and lists them down to ensure clarity below.

**All WOSSO associated parties must not:**

- Engage in sexual activity with anyone under the age of 18 (mistaken belief of age is no defence).
- Exchange money, employment, goods or services for sexual favours when working or traveling for work on behalf of WOSSO.
- Sexually abuse or exploit children or adults at risk.
- Abuse their position of power at work for their personal sexual gain.
- Knowingly engage in any commercially exploitative activities with children or adults at risk, including forced labour, slavery or trafficking of any individuals and especially children and adults at risk.
- Physically assault, or emotionally/ psychologically assault, a child or adult.

### 3 Reporting Concerns

**Please report any concerns to WOSSO management:**

Location	Name	Designation	E Mail
Africa	Debrah	General Manager Gender Links +27 84 724 7988	glservices@genderlinks.org.za
Asia	Emily	Operations Director ARROW +60 12 334 3650	emily@arrow.org.my
MENA	Rolla	Head of Gender & Social Development Practice MannionDaniels +447843063536	rolla.khadduri@manniondaniels.com
Overall	Colleen	Special Advisor Gender Links +27 82 651 6995	specialadvisor@genderlinks.org.za

Employees, fellows, partners, IAC members who are subjected to any form of abuse, physical, emotional, financial, mental, verbal abuse, harassment, violence or discrimination are encouraged to seek help and support. If you suspect abuse - please do report it on the principles of responsibility for safeguarding and do no harm. General guidance is if something doesn't feel right, it is better to err on the side of caution. It is obviously more clear if you see something that isn't right, or if you get a report from a colleague, community or document. It is hard to know what to do in a situation, which is why it is important to report it to a trained professional who can take the issue forward professionally, confidentially, and with respect to all individuals and procedures. Please do keep the information.

If the complaint concerns one of the regional contact points, please report this to the overall team lead Colleen Lowe Morna. If the complaint concerns the overall team lead, please report this to Rolla Khadduri.

If you prefer to report a concern and or allegation of abuse anonymously, then you can set up an anonymous email account and report the incident, to any of the above mentioned persons, with the reference WOSSO.

**Please specify as many details as you can**, acknowledging that more detail allows for a more thorough investigation. In particular, it is helpful to have details of:

**WHEN** - timing of allegation.

**WHAT** - specific nature of allegation including verbal communication if relevant.

**WHO** - who was involved in the allegation and witnessed it.

**WHERE** - location of allegation

**If the safeguarding incident is reported anonymously**, it is harder for WOSSO Safeguarding Lead to run an investigation. However, all attempts will be made to discuss the allegation with the person who reported it and to get as many facts as

possible, from others involved as well, in order to investigate the allegation. The most important factor here is to ensure the person in question is safe.

It is the responsibility of all associated parties of WOSSO to read and understand this WOSSO policy, as well as undergoing inception training and regular refresher training (timing to be determined according to the length and nature of their association with WOSSO).

## 4 WOSSO responsibilities

As WOSSO management, we have the responsibility **to disseminate this policy widely** so that all associated parties understand our safeguarding approach and code of conduct. We will do this by publishing this safeguarding policy online, and by ensuring awareness-raising/training for all associated parties on a regular basis (time period to be determined by nature of association with WOSSO). As according to FCDO due diligence for implementing partners organisations that work with children and adults-at-risk should apply a safeguarding lens to their promotional communications and fundraising activities.

As WOSSO management, we also have the responsibility of **carrying out safe-guarding due diligence** on our partners and suppliers, both initially and then on a regular basis for the duration of the partnership through regular monitoring at reporting stages. Capacity building will be offered where required.

As part of the **Duty of Care**, WOSSO has a responsibility to ensure the safety and well-being of all travellers to the best of its ability, whilst recognising that it is not possible to eliminate risk, but it can be managed to an acceptable level.

All travellers will be covered by travel insurance purchased by WOSSO consortium partners or that of their company. WOSSO consortium partners will follow their own internal duty of care procedures. All

travellers will be supported by before and during travel but will ultimately be covered through the insurance provider.

WOSSO will strive to maintain good practice in relation to duty of care. Before travel all individuals need to have a conversation with their

WOSSO consortium point person on:

- The risk assessment.
- Safeguarding brief.
- Travel good practice and advice.

Before international travel, a **travel risk assessment** should be completed by the corresponding WOSSO partner. The risk assessment will be carried out two weeks before the meeting/ conference by one of the WOSSO consortium partners as the

Advocacy working group comes together for planning and organising the travel for the specific meeting/conference. This will assess the risk as High, Medium or Low based on up-to-date country information from reliable sources e.g., FCDO travel advice, and outlined by relevant risk categories e.g., health, security, crime/terrorism threat. Mitigations will be put in place to help lower the risk as much as possible. Where possible, WOSSO should assess the traveller against these risks for personnel resilience e.g., years of travel experience, country/regional travel experience etc. The risk assessment will be approved by the WOSSO Manager and shared with the traveller at least one week before travel. If risk is too high, travel will not be approved.

WOSSO appreciates that travel presents specific advocacy repercussion risks, including:

- In the case of civil unrest in their home country whilst on a trip, the fellow may not be able to return to their home-country due to airports closing.
- The fellow may face safety concerns due to their overseas advocacy. This in turn could lead to activists choosing to stay in the overseas country beyond the period of the agreed advocacy.

In both cases, WOSSO cannot take consular or financial responsibility for the activist beyond what is agreed in the Fellowship Memorandum of Understanding (MOU). It is important for the Fellow to be fully informed prior to travel so that they can make an informed choice about whether or not they are willing to take the risk. It is WOSSO's responsibility to make that information clear and communicate it with full understanding of the Fellow (e.g. in the Fellow's language as well as written in the agreement) so there is no false sense of security that the programme, or any of its associated parties including donors, can take responsibility for the activist beyond whilst they are conducting the advocacy as agreed within the Fellowship agreement. This does not exclude WOSSO providing any moral support or linkages to its own networks where appropriate and possible, working on the basis of ethics and feminist values.

As WOSSO management, we also have the responsibility **to take all concerns and allegations of abuse seriously**, to respond to them appropriately with a thorough and fair investigation, to record all details and report where necessary, and to learn from

the instances to prevent. We also have the responsibility to ensure the well-being of all parties involved, most pertinently the victim to ensure that the investigation into the issue does not re-traumatise.

### **Specifically, our responsibilities at WOSSO are:**

- We will respond to notification of any concerns and/or allegations of assault within 24 hours.
- Before any investigations commence, we will notify FCDO of the Safeguarding concerns.
- We will then carry out a thorough and fair investigation, based on best practice and hearing points of view of all concerned (this will be prioritised and done giving it the thoroughness and time it deserves, whilst making sure that all people within the investigation are safe).
- We cannot commit to anonymity due to legal implications and the need to keep parties safe, but we can commit to confidentiality from those not directly involved in the investigation. Please note: You can never fully guarantee confidentiality to a child or adult. Information should always be shared if you think a child or adult is suffering, or likely to suffer abuse<sup>1</sup>.
- We will take expert, neutral advice where needed from an independent Safeguarding Advisor.
- We will record and report on all cases to WOSSO Leadership, and report relevant details to donors as contractually obliged and depending on the severity of the allegation.
- We will inform all parties involved of the outcomes of the investigation.

WOSSO is responsible for **conducting a robust investigation**. This includes:

- Gathering sufficient information when a complaint is made.
- Appointing a trained investigation team.
- Formulating the allegations based on the breach of the Code of Conduct/ organisations policies.
- Being clear about people's role.
- Adhering to these principles of investigation.

<sup>1</sup> If you suspect an adult is suffering due to a work situation, and you have had a discussion with them and they have asked you not to report it, you must respect their decision - unless you have reason to believe their safety is compromised. In that case, you must over-ride their request and report it in order to safeguard them from harm.

- Conduct fair evidence-gathering as much as possible.
- Analyse the evidence to make the findings.
- Holding a learning review on how the investigation went.
- Managing the expectation of people involved.
- Recording and reporting the investigation details if necessary.

### **The outcomes of investigations can vary, and may link to HR disciplinary measures.**

Sanctions include verbal or written warnings, demotions, transfer, suspensions or expulsions from the organisation and program. Once you escalate a concern, you have a right to ensure your concern is addressed to your satisfaction. That does not mean always agreeing with the decision, but it does mean respecting that a fair and due process of investigation was followed. If you feel that your concern has not been addressed (and subsequently that the child or adult has not been protected), you should escalate the matter to WOSSO Leadership directly (Colleen Lowe Morna - Special Advisor at [specialadvisor@genderlinks.org.za](mailto:specialadvisor@genderlinks.org.za)). In the unlikely event that you are not satisfied with the investigation thoroughness from the safeguarding lead or the WOSSO Leadership, you can escalate it to any of the other Safeguarding leads.

## 5 Processes and procedures

**Investigations can result in HR repercussions, such as a formal warning, suspension or expulsion from the WOSSO project.** If the concerned party is a stakeholder, investigations are preferably run in conjunction with the concerned party's organisation who should take responsibility for their actions. Thus investigations can also result in information being shared with other associated party organisations. If the incident investigation results in a person accused of 'personal misconduct' (behaviour that is not deemed to cause harm with intent, does not constitute bullying or harassment) rather

than bullying or abuse, follow-up in terms of an apology, mediation, or restorative justice will be pursued in order for the investigation to be fully closed. **The WOSSO Leadership team and where necessary independent expert advice, will have final decision on the repercussions of an investigation for WOSSO team members.**

The Safeguarding Leads will contribute to a **safeguarding incident log** that is updated to reflect all safeguarding cases, and specific investigation records. This is stored in a private space using online document storage which is password protected, and only three WOSSO staff with responsibilities for safeguarding have access to it.

This safeguarding incident log feeds into the **WOSSO risk register that is held by Debrah Mukuku**. The risk register is reviewed regularly at Leadership team meetings which occur monthly, and is used to reflect on vulnerabilities and mitigation of those to learn from incidents and to notify outside authorities (such as FCDO) where needed.

This safeguarding policy will be reviewed, approved and endorsed by the WOSSO Leadership annually, maintaining support for the safety of advocates. WOSSO management recognises that participation in policy-making processes and conferences for WOSSO Fellows might pose as safety risk for them whilst traveling, or when they return to their country due to

their advocacy. The risk might be so serious that they cannot return to their country due to concerns for their safety. WOSSO Management undertakes to ensure all WOSSO Fellows maintain full autonomy of their decisions whilst also being supported to make informed choices prior to travel and participation in policy-making processes. This involves clear discussions prior to their advocacy preparation and travel about the potential consequences of their actions/advocacy, and thinking through mitigation of these in a supportive way to the advocate. The design of the WOSSO program also involves Fellows (aged between 18-35) to be mentored and supported during policy-processes, so that supportive reminder and care for them can be maintained throughout the processes.

WOSSO Management also recognises that the well-being of Fellows might be at risk when they are exposed to policy-making processes where there might be political apathy or lack of obvious impact. WOSSO Management will aim to support WOSSO Fellows rather than put undue pressure on them, and maintain an environment of courtesy and kindness towards them at all times rather than undue expectation on social change. The WOSSO program design of not working with under-18 year olds is deliberate to ensure the safety and well-being of WOSSO Fellows who are able make well-informed choices with consideration and our support.