

INTRODUCTION

The Adara Group ('Adara') respects the dignity and basic human rights of people. Every person who represents or partners with Adara is expected to reflect these values in their professional conduct, regardless of who they deal with or where they are working.

Adara is committed to safeguarding the communities it assists and the people who it works alongside, including safeguarding those who are vulnerable to sexual abuse and exploitation. Adara recognises that our work brings us into contact with some of the world's most vulnerable individuals and communities, and this can put us in a position of authority over the communities we work with, in particular when dealing with vulnerable adults and children.

This Policy lays out the commitments made by Adara and informs staff, Adara Representatives, and Adara's In-country Programme Partners of their responsibilities in relation to safeguarding.

PURPOSE

This Policy provides a practical guide to:

- describe the standards of behaviour expected of Adara Representatives and In-country Programme Partners;
- describe how Adara designs and undertakes programmes and activities in a way that protects people from any risk of harm that may arise from their contact with Adara, including prevention or mitigation of sexual abuse or exploitation in Adara's programmes;
- ensure staff receive training on safeguarding at a level commensurate with their role in the organisation;
- respond to concerns and allegations of sexual abuse and exploitation in a timely manner.

This Policy does not cover:

- sexual harassment in the workplace. This is dealt with under Adara's staff policies and procedures;
- safeguarding concerns in the wider community, not connected with Adara or the actions of Adara staff, Adara Representatives or In-country Programme Partners.

Adara must adhere to local and international criminal laws. These include local laws where Adara's programmes and operations exist, and international laws and Conventions in relation to all forms of sexual abuse and exploitation.

DEFINITIONS

For the purposes of this Policy the following definitions apply.

ADARA REPRESENTATIVES means all individuals engaged with work conducted by Adara or visiting Adara programmes or offices at the request or invitation of Adara, including but not limited to, trustees, directors, employees, consultants, secondees, volunteers, interns, work experience students, contractors, ambassadors, donors and programme visitors.

IN-COUNTRY PROGRAMME PARTNER means an organisation Adara funds to assist Adara carry out its remote community development (RCD) or maternal, newborn, child health (MNCH) programmes.

FOCAL PERSON means each person appointed to this role by Adara who has a key role in raising safeguarding awareness throughout the organisation, and in coordinating, supporting and advising on the development and implementation of the Safeguarding Policy.

SAFEGUARDING means taking all reasonable steps to protect people, including children and vulnerable adults, from harm that arises from coming into contact with Adara Representatives or our programmes; and responding appropriately should harm occur.

SEXUAL EXPLOITATION means 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 another¹.

SEXUAL ABUSE means actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions².

SEXUAL EXPLOITATION AND ABUSE (SEA) can occur against a child or an adult and can occur between people of the same or different gender. It includes situations such as:

- sexual exploitation and abuse;
- child sexual abuse and exploitation;
- women and men sexually exploited through sex work;
- sexual harassment;
- possessing, controlling, producing, distributing, obtaining or transmitting sexually exploitative images of adults or children.

TRANSACTIONAL SEX means the exchange of money, employment, goods or services for sexual activity. This includes any exchange of assistance that is provided to a beneficiary or programme participant.

STANDARDS OF BEHAVIOUR

Adara has developed a Code of Conduct that is consistent with this Policy, and which provides clear behavioural guidelines and expectations for Adara Representatives. The Code of Conduct is annexed to this Policy.

Adara recognises that each country has its own legal system. This Policy and these standards must be interpreted and enforced in accordance with local law. There may be instances where this Policy and these standards are more stringent than local law, and in these cases this Policy should be followed.

RESPONSIBILITIES TO PREVENT AND RESPOND TO SEA

All Adara Representatives are responsible for championing good practice and maintaining an organisational culture that prioritises safeguarding, in particular against SEA.

Adara

- designs and implements appropriate programmes based on an impartial assessment of needs and risks, and an understanding of the vulnerabilities and capacities of different groups;

¹ UN Secretary General's Bulletin on protection from sexual exploitation and abuse

² UN Secretary General's Bulletin on protection from sexual exploitation and abuse

- undertakes appropriate due diligence in line with its policies to ensure partners and contractors are aligned with its values
- undertakes effective recruitment, training and performance management, including ensuring Adara Representatives understand safeguarding (including prevention of SEA) requirements;
- provides effective induction on prevention of SEA for all Adara Representatives, and In-country Programme Partners who will be engaged in work for Adara;
- develops communication material about prevention of SEA in local language and will share with Adara Representatives and In-country Programme Partners as appropriate.

CORE OBLIGATIONS

Adara Representatives

- will not use their position of authority and trust to request any service or sexual favour from beneficiaries of Adara programmes, adults, children or others in the communities in which Adara works, in return for protection or assistance, or coerce a person to engage in sexual intercourse or any sexual activity;
- will not behave in a way whereby their actions (physical, verbal or otherwise) are or could be perceived as offensive, inappropriate, abusive, neglectful or exploitative;
- will not engage in any form of sex with a programme participant or beneficiary, including Transactional Sex, as these relationships are based on inherently unequal power dynamics and there is the potential for abuse of power;
- will not have sex with sex workers (including Transactional Sex) when working or volunteering with Adara overseas, even when it is legal in the country;
- will not procure sex for others, or use a third party to do so;
- will not use Adara or Adara In-country Programme Partner facilities, personnel or resources for the purpose of arranging or facilitating access to sex workers by any person, including visitors to Adara offices or programmes;
- will comply with all relevant laws of their home country and local laws of the country to which he or she is placed, or in which he or she is travelling;
- will ensure personal conduct towards a co-worker is not exploitative or such that it reasonably leads to a perception of exploitation;
- will report any concerns or suspicions regarding safeguarding violations to the appropriate manager;
- will respond swiftly and in confidence to any allegations involving safeguarding violations, including, where relevant, raising with the appropriate authority;
- will not become engaged in a personal relationship with a programme participant or beneficiary, which may be perceived as inappropriate or exploitative, or where a real or perceived unequal power dynamic may exist.
- will strive to establish a culture that empowers communities and beneficiaries, to know their rights and entitlements, and have access to information and participate in decisions that affect them;
- will conduct themselves in a manner that is consistent with Adara's culture and values.

ADARA IN-COUNTRY PROGRAMME PARTNERS

Before entering into a Partnering Agreement with an In-country Programme Partner, Adara will conduct sufficient due diligence on the In-country Programme Partner (including their key personnel). The due diligence will be conducted with the assistance of Adara's legal team.

All agreements made with In-country Programme Partners (under a Partnering Agreement) contain a clause on ensuring safeguarding practices, including preventing harm to children. This is an opportunity for

Adara to discuss and promote safeguarding (including child safeguarding) with In-country Programme Partners and share knowledge in this area.

Where Adara In-country Programme Partners (under a Partnering Agreement) are made aware of this Policy and Code of Conduct, they must conduct themselves in a manner consistent with the conduct and expected behaviours outlined in it.

It is the responsibility of In-country Programme Partners to inform and where appropriate provide training to, their employees, contractors and volunteers in relation to the Safeguarding Policy and Code of Conduct. Where appropriate, Adara will provide support and assistance to Adara's In-country Programme Partners, by providing relevant training and sharing materials to help them understand safeguarding practices.

As part of the review process of this Policy (see Review below), Adara will seek feedback from In-country Programme Partners to monitor their compliance with this Policy.

REPORTING

Adara provides a safe, supportive and secure environment to report breaches of this Policy and Code of Conduct. All reports will be recorded, regardless of whether substantiated or a full investigation is required. Adara is committed to protecting the privacy of survivors, whistle-blowers and alleged perpetrators. All records relating to a SEA report will be securely stored and kept confidential, unless disclosure is required under the law.

For reports of SEA in relation to individuals under the age of 18, please refer to Adara's Child Protection Policy.

ALL ADARA REPRESENTATIVES, WHEREVER THEY ARE LOCATED, ARE REQUIRED TO REPORT IMMEDIATELY, ANY:

- disclosure or allegation from a community member or Adara Representative regarding the safety, abuse or exploitation of another Adara Representative, programme participant or beneficiary;
- observations of concerning behaviour by any Adara Representative or In-country Programme Partner that breaches this Policy and Code of Conduct;
- inappropriate use of Adara's technology, including computers and photographic equipment;
- Adara Representative or Adara In-country Programme Partner personnel engages in suspicious behaviour that could be associated with SEA

The report should be made to one of the following individuals (also referred to as the Focal Person) as applicable, or emailed to complaints@adaragroup.org:

- Senior Programmes Director: Madeline.Vaughan@adaragroup.org
- Country Director – Nepal: Pralhad.Dhakal@adaragroup.org
- Country Director - Uganda: Daniel.Kabugo@adaragroup.org
- Global Health Director: Heidi.Nakamura@adaragroup.org

A report can be made anonymously, but that may hinder Adara's ability to investigate the report. Adara may be compelled or permitted by law, regulatory obligations or broader external and management requirements to disclose the identity of the person making the report.

The report can initially be made verbally, and later in writing, by completing the Adara incident reporting form, which can be obtained from Adara's intranet. Hard copies of the incident reporting form will also be translated into local languages and provided to all In-country Programme Partners to make available in their offices.

If a person makes a report in good faith, or if they cooperate with an investigation into a report, they will be protected by this Policy. Malicious reporting with the intention of harming another person's integrity or reputation amounts to misconduct and can be subject to disciplinary action.

IF AN ADARA REPRESENTATIVE KNOWINGLY CHOOSES NOT TO REPORT AN INCIDENT OR ANY SUSPICION OF SEA, THIS WILL BE TREATED AS SERIOUS MISCONDUCT, RESULTING IN DISCIPLINARY ACTION, INCLUDING TERMINATION OF THE ADARA REPRESENTATIVE'S EMPLOYMENT, ENGAGEMENT OR INVOLVEMENT WITH ADARA. ANY ADARA REPRESENTATIVE WHO REPORTS AN INCIDENT OR SUSPICION OF SEA IN GOOD FAITH WILL BE PROTECTED IN ACCORDANCE WITH ADARA'S WHISTLEBLOWER POLICY.

All reports of suspected or alleged incidents of sexual exploitation or abuse, or non-compliance with this Policy will be reported to the governing body of the relevant Adara entity.

INVESTIGATION

All reports of suspected or alleged incidents of sexual exploitation or abuse will be considered in a manner that is timely, fair, objective and as practicable, confidential. All sensitive information collected during this process will be stored in line with Adara's Privacy Policy.

The initial steps that should be taken in relation to an incident concerning allegations of abuse or exploitation are as follows:

- once reported, an Incident Team consisting of all or a combination of the following individuals will be formed:
 - the Focal Person;
 - the Chair;
 - the Chief Executive Officer;
 - the Chief Operating Officer;
 - the General Counsel; and/or
 - any other individual who is deemed appropriate by the Incident Team.
- the Incident Team will assess whether the Police (if the alleged behaviour is criminal) or any relevant statutory bodies need to be notified in relation to the allegations;
- if appropriate, the Incident Team will investigate the allegation, or the Incident Team will appoint someone to investigate the allegation;
- investigations will be completed in a timely manner and information about the outcome will be shared with the survivor, and where appropriate the complainant;
- the Incident Team will take all actions necessary to reduce/remove risk;
- substantiated allegations will result in either disciplinary action (including in serious cases, dismissal) or contractual consequences, and if not, the reasons as to why will be clearly documented.

SURVIVOR SUPPORT AND ASSISTANCE

When responding to reports alleging SEA, Adara will adopt a survivor centred approach. To the extent permitted by law and mandatory regulatory requirements all action taken by Adara will be guided by respect for choices, rights and dignity of the survivor.

Adara will ensure survivors of SEA are offered support and assistance such as flexible work arrangements, referral to safe health/medical, psychosocial and legal/justice response where appropriate, and where required, to specialised children's or women's services.

Children have the right to participate in decisions that may affect them. If a decision is taken on behalf of a child, the best interests of the child will be the overriding guide.

Survivors will be provided with information on the progression of any investigation and final outcome.

BREACH OF POLICY

Incidents of sexual exploitation and abuse constitute acts of gross misconduct and grounds for disciplinary action or contractual consequences. Disciplinary actions/possible outcomes can include

- referral to local law enforcement authorities (under national and any mandatory reporting laws), where appropriate;
- suspension pending investigation;
- performance management;
- formal warning and monitoring;
- termination of employment for staff or assignment for Adara Representatives.

REVIEW

Adara will regularly monitor the implementation of this Policy and related procedures to ensure it continues to operate as intended.

This Policy will also be reviewed every two years from the date of approval, or more frequently if appropriate. Adara's legal and programmes teams will work together and liaise with other appropriate stakeholders to ensure the policy is reviewed prior to the scheduled date (Next review).

RELATED POLICIES

- Anti-Bullying Policy
- Child Protection Policy and Code of Conduct
- Complaints Handling Policy
- Whistleblower Policy
- Social Media Policy
- Child Safeguarding Toolkit
- Staff Policies and Procedures Manual
- Partnerships Guidelines

Version: 1.0

Effective:

Next review:

File Path: G:\Adara Development\Governance\Non-Confidential\Policies, Procedures, Forms\Safeguarding

Version Number	Date Approved	Author	Authorised By	Comments

SAFEGUARDING POLICY - CODE OF CONDUCT

Adara Representatives must comply with the Safeguarding Policy and Code of Conduct when undertaking work performed for or in association with Adara, including:

- while at Adara project sites (including outside of normal working hours);
- while undertaking work activities (including interaction with clients, beneficiaries, donors, partners or other third parties); or
- at work-related events (e.g. fundraising and client functions, social functions and conferences).

Adara Representatives must:

- ensure that their conduct at all times is consistent with Adara's values and culture and does not damage the reputation of Adara;
- comply with all relevant Adara policies and procedures, including the Safeguarding Policy, the Child Protection Policy, Adara Group's Code of Conduct and Adara Group Culture and Values Policy (**attached**);
- not use their position of authority and trust inappropriately;
- not engage in any form of sex with a programme participant or beneficiary, including Transactional Sex;
- not have sex with sex workers (including Transactional Sex) when working or volunteering with Adara overseas, even when it is legal in the country;
- not procure sex for others, or use a third party to do so;
- will not use Adara or Adara In-country Programme Partner facilities, personnel or resources for the purpose of arranging or facilitating access to sex workers by any person, including visitors to Adara offices or programmes;
- not use any computers, mobile phones, video and digital cameras, or other technology inappropriately;
- not access, create or distribute pornography;
- immediately report concerns or allegations of abuse or exploitation, or a breach of the Safeguarding Policy and Code of Conduct in accordance with appropriate procedures outlined in the Safeguarding Policy;
- cooperate to the best of their ability with any requests from Adara during an investigation into an allegation of SEA;
- comply with all laws in their home country and local laws of the country in which they are placed or travelling, and any lawful directions from the Adara management team; and
- ensure that their personal conduct towards a co-worker or partner is not exploitative or such that it reasonably leads to a perception of exploitation.