# **SAFEGUARDING POLICY**

v1, August 2019

Social Innovation Academy (SINA)

### Content

1.	Introduction	2	
2.	Definitions	3	
3.	Target groups of the policy	5	
4.	Purpose and commitment	5	
5.	Standards	6	
6.	Measures to implement the policy	7	
7.	Reporting and responding to incidents	9	
8.	Implementing, maintaining and reviewing the policy	12	
9.	Communications regarding children	13	
Anr	nex 1: Safer Recruitment	14	
Anr	nex 2: Code of Conduct	15	
Anr	Annex 3: Incident Report Form Template17		

### 1.Introduction

The Social Innovation Academy (SINA) tackles failing education and resulting unemployment in Africa through creating self-organized and freesponsible learning spaces where disadvantaged youth unleash their potential for positive change through Social Entrepreneurship.

SINA Communities are independent organizations implementing the SINA Model via a Social Licence. SINA Communities work with youth from 18 to 30 years from disadvantaged backgrounds. This include former orphans, individuals from an extreme poverty backgrounds, former sex workers and refugees. Some SINA Communities are located within a refugee camp or settlement, where often basic needs are not met, leaving them vulnerable.

The SINA Model is a self-governed and "freesponsible" approach that lets young adults learn the skills needed for creating own enterprises by taking up responsibilities within a SINA community. A five-step empowerment process supports "scholars" to develop personal and professional skills to create their own enterprises. After an initial training, beneficiaries overcome limiting beliefs, discover their purpose and set goals. After, as full-time members, everyone collectively runs the program and takes over responsibilities within the SINA Community to gain skills and experiences. Through mentoring and coaching, SINA supports emerging business ideas from problem-solution-fit to product-market-fit, gain traction and generate revenue. SINA provides mentorship, networks, workspace, internet, and finances (for prototyping and customer discovery), as well as support in creating professional, formal and sustainable organizational processes.

Youth become community members and take over roles structured through *Holacracy*. With this they fully run and own the community. In essence, there are no "staff" but management through self-organization. Through their roles and sessions individual and professional growth takes place. The ultimate goal for a SINA member is to create teams and form social enterprises, tackling challenges of the community and become an independent organization. Within the ideation and incubation phases of an enterprise, the team will interact with a variety of beneficiaries, depending on the nature of their enterprise. Pas SINA Social Enterprises have e.g. worked with survivors of sexual abuse or provided employment opportunities for the disabled.

### 2. Definitions

### Child

The term 'child' has the specific legal meaning of anyone below the age of 18 years (as defined by the United Nations Convention of the Rights of the Child 1989).

### Adult

The term adult therefore refers to anyone aged 18 years or over.

#### Adult at risk

An adult "who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation"

#### **Vulnerable Adult**

A vulnerable adult is someone aged 18 or over who has care and support needs due to their age or frailty, mental or physical health problems, gender, learning or physical disabilities or the impact of disasters and conflicts, and who is unable as a result to protect themselves from harm, exploitation or abuse.

#### Abuse

Abuse occurs when an individual or individuals hurts another adult or child, either physically or mentally. In the majority of cases, the abuser is someone the victim knows well, such as a parent, other caregiver, relative or friend. Abuse can be intentional or unintentional. There are several forms of abuse including:

#### a) Physical abuse

Physical abuse is causing deliberate injury to a person, however slight. This may involve hitting, shaking, throwing, poisoning, biting, burning or scalding, drowning, suffocating or otherwise causing or attempting to cause physical harm to a person. Physical harm may also be caused through the misuse of medication, restraint or inappropriate sanctions (for example, corporal punishment) or being given alcohol or a substance that is known to cause harm.

#### b) Emotional/psychological abuse

Emotional or psychological abuse is the emotional ill-treatment of a person that adversely affects their wellbeing or development. Some level of emotional abuse is involved in all types of ill treatment, though it may occur alone. It includes threats of harm, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or support networks.

#### c) Sexual abuse

Sexual abuse is the involvement of a person in sexual activities which they do not want or truly understand, or to which they are unable to give valid or effective consent. This may involve rape, sexual assault, inappropriate sexual contact or exposure to inappropriate material.

Any kind of sexual activity involving a child constitutes sexual abuse, whether or not the child is aware of, or consents to, what is happening. This includes rape, incest, fondling

genitals, masturbation, voyeurism, exhibitionism, exposing a child to adult sexual material, or making them take part in any sexual activity, real or simulated, whether face-to-face, online, or in any other medium.

### d) Financial or material abuse

Financial or material abuse is the theft or misuse of a person's property or assets. This includes money being withdrawn or stolen, goods or services purchased in someone's name without their consent, being deliberately overcharged for goods or services, misappropriation of property, possessions or benefits, or money being borrowed by someone who is providing a service to the vulnerable person.

### e) Discriminatory abuse

Discriminatory abuse is repeated, ongoing or widespread discrimination due to a person's age, sex, gender, disability, racial heritage, religious belief, sexual orientation, appearance or cultural background, marriage or civil partnership, pregnancy and maternity. This can include unfair or less favourable treatment, sexual or gender preference, slurs, harassment, name-calling, bullying, cyberbullying, breaches of civil liberties, and unequal access to health or social care.

### f) Harmful traditional practices

Harmful traditional practices are forms of violence which have been committed (primarily against women and girls) in some communities and societies for so long that they are considered, or presented by abusers, as part of accepted practice. Such traditions include Female Genital Mutilation (FGM) and forced early marriage. They may also include different forms of ritual ceremonies involving individuals in harmful religious or spiritual activities. Children and adults with disabilities may be at higher risk of becoming victims of witchcraft beliefs in certain contexts for example individuals with albinism

### g) Harassment

A behavior that can cause the recipient to be embarrassed, uncomfortable, distress and has the effect of humiliating, intimidating, or coercing someone through personal attack. or any behavior that is *unwelcome, unwanted, or unsolicited* where the recipient regards it as offensive or undesirable. (When a person communicates that the behavior is unwelcome, it becomes illegal. Even if the conduct is not stated but implied, as long as it is unwelcomed it is unlawful.)

### Safeguarding

Safeguarding means promoting and protecting people's health, wellbeing and human rights, and enabling them to live free from harm, exploitation and abuse. A safeguarding approach means identifying and minimising the risk of harm to SINA members and stakeholders, including children and adults (from staff and SINA members, representatives and partners). This includes responding appropriately to any safeguarding concerns about children and adults within communities where we work. It entails a wide potential range of policies, procedures and activities seeking to address child and adult safety and wellbeing.

In SINA's case, a safeguarding approach means minimising the risk of harm, exploitation or abuse of beneficiaries from staff and SINA members, operations and programme activities. It includes reporting any safeguarding concerns within communities where we work to the appropriate authorities. This policy focuses on addressing those risks by developing standards and mitigating measures to target and reduce residual risk.

Following the widespread and serious allegations of sexual exploitation and abuse by aid workers in West Africa at the turn of the millennium, the UN Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse was issued in 2003. It has been applied by all major humanitarian agencies and integrated into their policies and procedures. Subsequently the "do no harm" principle is now widely recognised as an important element in the wider strengthening of safeguarding systems at both national and local level when providing health, education and social protection services.

### 3. Target groups of the policy

The Safeguarding Policy is to be applied across all organisational activities and in all of SINAs Communities. All SINA representatives and partner organisations should be aware of and adhere to the policy. SINA representatives are defined as trustees, employees (permanent or temporary), consultants, volunteers who work directly for SINA and donors travelling on SINA business.

In addition to complying with the policy all representatives must sign and will be held accountable to the SINA Safeguarding Code of Conduct.

First and foremost, it is expected that partners will have policies and procedures in place covering safeguarding in order for SINA to enter into partnership. This will not always be the case as the start of a partnership, particularly with grassroots civil society partners. Where partners do not have appropriate policies, but it is deemed essential that SINA work with them, policies will be developed as part of the early stages of the partnership, led by the due diligence process.

SINA is unable to enforce the policy with independent, external agencies, such as partner organisations. However, we can choose not to work with partners, put specific conditions into partnership agreements, or end partnerships based on partners' policies and their implementation of these, including safeguarding.

### 4. Purpose and commitment

The purpose of this policy is to ensure that SINA activities are implemented in a safe and protective environment where harm, exploitation and abuse are effectively prevented as far as reasonably possible, and responded to effectively.

The policy has three specific objectives:

- 1) Keeping beneficiaries, children and adults safe
- 2) Safeguarding the reputation of SINA, including guarding SINA representatives from false allegations or from operating within an unclear framework
- 3) Ensuring the highest standards of behaviour from representatives and minimising the risk of abusers entering the organisation.

SINA is committed to doing whatever we can to keep everyone safe. In all activities involving children, including fundraising, communications and programme activities, primary consideration should be given to children's rights, following the "best interest" of the child, the child's right to life and development, the child's right to be heard/participate, and the child's right to non-discrimination.

### Principles of safeguarding

SINA is committed to six key principles that should underpin all safeguarding functions, actions and decisions:

- 1) Empowerment. People being supported and encouraged to make their own decisions and informed consent.
- 2) Prevention. It is better to take action before harm occurs.
- 3) Proportionality. The least intrusive response appropriate to the risk presented.
- 4) Protection. Support and representation for those in greatest need.
- 5) Partnership. Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- 6) Accountability. Accountability and transparency in delivering safeguarding.

### 5. Standards

Awareness and communication:

### All SINA representatives are aware of the policy and the organisation communicates

### its approach to key stakeholders

- All SINA representatives are responsible for complying with the policy and code of conduct, including following all reporting and response procedures outlined.
- SINA representatives will be introduced to the policy and sign the code of conduct as part of their induction, contracting or ongoing management process.
- SINA will communicate the policy through its website and directly to core stakeholders and partners to demonstrate its commitment and the importance of the policy
- SINA will only enter into an MoU with organisations that either have safeguarding policies in place, or are committed to developing them. Where a partner's policies

and procedures are less strong than SINA, consideration will be paid to advocating for and providing technical support to strengthening of the policy.

### Recruitment, selection and training

- Recruitment processes for any employees will include relevant questions on experience working with vulnerable adults, and additional references or background checks will be undertaken for posts identified as high risk.
- SINA will provide necessary training and support to representatives to ensure effective implementation of the policy.

### **Collection of Data and Reporting of Incidences**

- SINA representatives will ensure that appropriate consent is obtained before images or stories of adults and children are captured or shared.
- SINA will ensure that adults and children are represented in an appropriate way that does not victimize or sexualize them.
- SINA will only collect data on individuals for a specific authorized purpose and it will only be used as intended. It will be stored in a way that complies with relevant legislation and our own data protection procedures.
- Any breaches to the security of personal data must be reported and acted on immediately.
- SINA staff and SINA members will not use SINA equipment to view, share or access illegal or inappropriate material, including any that specifically includes children.
- All SINA representatives must also follow appropriate and relevant national legislative and criminal reporting procedures as advised by the SFP.

### 6. Measures to implement the policy

The safeguarding policy requires the following steps for its implementation.

Staff and SINA members including the designation and training of Safeguarding Focal Persons (SFP) in each SINA Community.

Prevention measures including awareness raising, training of relevant staff and SINA members, risk analysis, recruitment procedures, induction of staff and SINA members in the policy and codes of conduct for SINA representatives and incorporation of the policy into relevant existing systems.

Reporting and responding measures including steps for alerting and reporting safeguarding concerns, investigation and incident management, duties and responsibilities of assigned managers and safeguarding focal point persons.

Implementing and maintaining the policy, including training and capacity building of staff and SINA members and partners, monitoring, reporting and review of the policy.

### Staff and SINA members

SINA will designate a **Safeguarding Manager (SM)** at the international level (Community of Practice) and Safeguarding **Focal Persons (SFPs)** in each SINA Community. There are three fundamental aspects to the role, with specific levels of responsibility within each SFP:

1) To build the understanding and capability of the organisation required to implement this policy. This will include direct knowledge and information transfer, and accessing appropriate external expertise.

2) To act as the reporting mechanism for any safeguarding concern and use lessons learned from specific incidents to improve policy and practise.

3) The Role holders are elected by the entire Community, to ensure role allocation to the most trusted person

SINA will ensure sufficient time is given to the SM and SFPs to acquire the necessary skills and knowledge and to undertake the above activities.

### Prevention

Staff and SINA members recruitment

All recruitment of staff and SINA members will include a full induction to the safeguarding policy and code of conduct, including procedures to follow should any safeguarding concern arise.

When recruiting staff and SINA members, SINA will make sure that questions regarding safeguarding are included in any relevant interviews, and that any roles with safeguarding responsibilities have those responsibilities explicitly outlined within the job description. Where possible, references should be sought from previous employers to get more information of the suitability of candidates.

All SINA representatives will be required to acknowledge receipt of and compliance to the Safeguarding Policy and sign up to the Code of Conduct prior to their employment.

### Awareness

SINA will designate staff and SINA members with the responsibility of building internal awareness and supporting relevant capacity development of the organisation in safeguarding, as detailed in section 5.1 of this policy. All SINA representatives and partner organisations will be duly notified of the Safeguarding Policy and be made aware of how they will be expected to comply with it. The policy will be translated into the appropriate national languages where SINA operates. It will be the responsibility of all SINA staff and SINA members to share the policy and approach as relevant to external stakeholders.

SINA will ensure all supporters, donors, sponsors and media representatives involved with SINA work have access to the Safeguarding Policy through its website and will take appropriate steps to communicate that availability.

#### **Risk analysis**

When working with partners, SINA will endeavour to ensure that the programmes it supports are safe for adults and children they serve. To ensure that appropriate safeguarding measures have been put in place, SINA will work with the partner, either during the project development process, or the inception phase, to carry out a safeguarding risk analysis which specifically includes any safeguarding issues and propose actions to mitigate these risks, prior to the activities taking place.

#### Code of Conduct

All SINA representatives are required to understand their responsibility to keep adults at risk and children safe, and to sign and abide by the SINA Code of Conduct (Annex 1), which lists acceptable and unacceptable behaviour, primarily designed to safeguard others. It also serves to guard the name and reputation of SINA and its representatives from false accusations. All staff and SINA members are responsible for encouraging and promoting the implementation of the Code of Conduct.

The adherence to this code is mandatory for all SINA representatives. Any violation of the Code of Conduct will result in disciplinary procedures in addition to any relevant legal action. To give maximum protection to beneficiaries, the organisation and staff and SINA members, the Code of Conduct is to be applied both within and outside of working hours.

### 7. Reporting and responding to incidents

SINA will ensure that reporting and incident management procedures to handle safeguarding concerns are in place and effectively used to enable an appropriate and swift investigation of any given case. SINA representatives should be properly informed of the reporting and incident management procedures. Any SINA representative who has a concern or suspicion regarding harm, exploitation or abuse by someone representing another agency must report such concerns to the Safeguarding Manager or designated SFP.

#### Confidentiality

All reports and the information herein will be handled with strictest confidentiality to protect the identity of the individuals concerned, the informer and the accused, both appropriately and in accordance with relevant national legislation. A written record will be made of what information has been shared with whom, and when. All written records will be stored on secure files in a central place separate from project material.

### Consequences of harm, exploitation or abuse

Any behaviour towards children or adults, which results in harm, exploitation or abuse, or the failure to follow the general requirements and specific code of conduct of this policy, is grounds for the following measures:

### Representatives

If a SINA member or employee has been under investigation by SINA or by official law enforcement authorities for any area of harm, exploitation or abuse as defined under this policy, they will be subject to disciplinary procedures. Under these procedures they may be temporarily suspended during the investigation. If an employee is dismissed for proven harm, exploitation or abuse, SINA will inform the relevant authorities, disclose this to prospective future employers and/or refuse a reference, depending on the details.

### Partner organisations

Appropriate action will be taken up to and including immediate termination of a partnership or service agreement. In this case, the short or long-term impact on beneficiaries of the termination of a partnership will be considered.

### Process for safeguarding incidences among SINA members /beneficiaries:

The freedom of accessing benefits of SINA and being part of the community comes with the responsibility to abide by SINA values and the safeguarding of a comfortable and safe space for everyone involved.

After the occurrence of an incident, at least three members of the "Community Committee" sit with all parties involved for a hearing to be able to make a neutral and fact-based decision. The "Community Committee" in each SINA community is made up of 7 members, elected every six months. The Applied Social Innovation Members, the Linking Members and the Emerging Members each elect one representative into the Committee (beneficiary representation). Four further members are elected among all SINA members in a Unity Time.

### After the hearing:

The Community Committee gathers (with at least 50% members present), discusses on the risk factor and makes a final decision through integrative decision making, basing on the following basic standards:

- substantiated: there is sufficient evidence to prove the allegation(s);
- false: there is sufficient evidence to disprove the allegation;
- unsubstantiated: there is insufficient evidence to either to prove or disprove the allegation(s). The term, therefore, does not imply guilt or innocence. Any decision of the hearing will be on the basis of balance of probability. Where an allegation is substantiated, any sanction will satisfy the test of reasonableness in all the circumstances and any sanctions will be proportionate to the nature of the misconduct.

Depending on the circumstances, disciplinary action could take the following forms:

- written warning e.g. where there has been a failure to conform to standards and person is to join the Community Circle to support creating a SINA culture of happiness, trust and harmony after mild incidences and if little to no risk is found for the occurrence of further incidences
- suspension (1 to 6 months) e.g. where conduct has failed to improve following previous warning(s)or misconduct is sufficiently serious
- A SINA member at risk of causing serious injury to others, damage to property or misappropriation of finances (including threatening those actions), and/ or where an act of gross misconduct has been committed, shall be expelled from the SINA Community
- If a Safeguarding Focal Person is involved in any substantiated allegations, the person will immediately loose the role
- Opening and following up a police case: for minor and cases a form of restorative justice and community service shall be preferred over reporting to the police if the committee has the strong belief of no cause of further harm by the same individual.

Examples of cases for expulsion:

a) Cases of repeated harassment or bullying

b) Serious cases of discrimination or victimisation

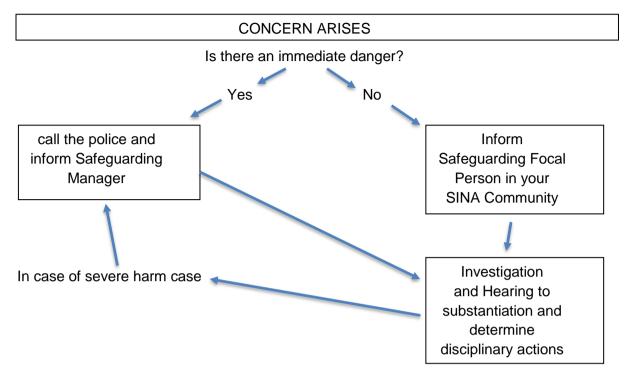
c) Malicious or vexatious complaints against other members of the community

d) Offences involving the misuse or illegal possession of drugs, and/or serious cases of being under the influence of alcohol or drugs

Examples of cases for referral to police:

- a) Actual physical assault or violence
- b) Serious sexual misconduct and sexual
- c) Abuse against children or young people
- d) Major Theft, fraud, embezzlement or misappropriation of funds or assets

### Flow Chart



# **8.** Implementing, maintaining and reviewing the policy

SINA will integrate safeguarding measures into relevant core internal processes and tools such as programme technical guidelines, partner assessments and agreements, training modules, programme design, monitoring and accountability systems and recruitment procedures.

SINA will make sure that proper induction and training in safeguarding will be made available to all staff and SINA members, permanent and temporary, consultants and volunteers. The SM and SFPs will receive additional training in order to manage their responsibilities for rolling out, managing and coordinating the safeguarding policy and procedures.

Where relevant, SINA will support partner organisations by including relevant training and technical advice to build capacity in the field of safeguarding, with a particular focus on children and adults with disabilities. The policy will be monitored on a regular basis by the designated SM and the SFPs.

### 9. Communications regarding children

SINA is committed to adhering to ethical guiding principles on communications to minimize the risks of people misusing photographs and related information beyond the agreed purpose and consent. The best interests of the featured adult or child are to be safeguarded as a primary consideration. To this effect, SINA' representatives and partners will abide by the following guidelines.

• Ensure all interviews and images of adults and children are undertaken with sensitivity to safeguard the individual's rights to dignity, identity, confidentiality and privacy. Where possible individuals should be prepared for interviews prior to being interviewed. In the case of children, a parent or guardian should be present during interviews, where appropriate, or their permission sought beforehand for a professional adult with agreed responsibility (such as medical or educational professionals) to be present on their behalf.

• Pictures of adults and children should be decent and respectful and should not stigmatize community, family or the individual. All children, both girls and boys, should wear decent clothing appropriate to the local custom.

• Prior consent to use the information collected in interviews and / or images of adults and children should be obtained from the individual themselves (if they possess the maturity to do so), and in the case of children, consent must also be obtained from their parents and/or guardians. To help keep adults and children, consideration should be given to how much information is published.

• SINA and its partners are committed to guard carefully any information about adults and children who feature in their publications, ensuring that their personal data are used appropriately. This also applies when material is made available to third parties. Full names should never be provided alongside other identifiers such as date of birth or community.

• Pictures, materials and personal information regarding individuals will be held in a secure database and according to the appropriate SINA data security protocols. Access to these materials will be employees only through a password-protected system. The misuse of images accessed will be treated in the same way as other breaches of this policy. Applicable data protection laws for all stored images will be followed.

### Annex 1: Safer Recruitment

### What is Safer Recruitment?

Safer recruitment means giving consideration to safeguarding issues at every stage of the recruitment process. It is known that people who seek to harm others by using their professional or volunteer status will look for an organisation or project with weak recruitment practices, where they can have access to at-risk adults or children.

SINA' safer recruitment guidelines means that potential employees must:

• Complete the specified application process for the role to which they have applied, indicating whether they know anyone who works for SINA and if so their relationship to that person or persons;

• Undertake an interview to assess suitability and capability to carry out the role. If offered a role, provide references covering the previous three year period, accounting for any gaps in employment; and

• If offered employment, provide identity documents including photographic identity and evidence of their right to work in the respective country.

• Submit a Letter of Good Conduct from Police of Country of Residence or Interpol

### Annex 2: Code of Conduct

- 1. I will always make sure that beneficiaries/clients (including children), staff and partners are treated with respect, dignity and equality regardless of their age, sex, physical condition, impairment, language, religion, opinion, nationality, ethnic or social origin, status, class, caste, sexual orientation, or any other personal characteristics.
- 2. I will always promote non-violent and positive behavior when interacting with beneficiaries/clients and staff which includes not touching them in an inappropriate manner that takes away their comfort, use languages or make suggestions that provoke, harass or degrade the person.
- 3. I will always show respect to all categories of employees, partner's staff, community volunteers or beneficiaries/clients.
- 4. I will never engage in or tolerate any form of harassment, discrimination, physical or verbal abuse, intimidation or favoritism in the workplace, including sexual and psychological harassment and abuse of power, respecting the rules that apply to me (especially Internal Rules) on these issues.
- 5. I will always behave in a professional way with colleagues, avoiding spreading rumors and false allegations and refraining from any comment based on gender, sexual orientation, or any other personal characteristics which may be considered as harassment.
- 6. I will always assess the risk of harm of any sort and organize the workplace and plan activities so as to minimize it, taking into account the impairment, health condition, age and development of the child or any other condition or vulnerability of staff and beneficiaries/clients.
- 7. I will always plan activities ensuring that information concerning beneficiaries/clients, children, families and communities remains confidential.

### **Child protection**

- 1. I will never subject a beneficiary/ clients to any kind of humiliating, degrading or abusive behavior, whether physical, verbal or psychological or of other nature.
- 2. I will always inform beneficiaries/clients (including children) and communities of their right to report any worrying situations, especially related to intimacy issues and how they can raise a concern.
- 3. I will always try to take into account the capacity of the beneficiary/clients to participate, to respect his/her opinion, choices and autonomy, not doing things of a personal nature that the beneficiary/client can do for themselves (e.g. toileting/ changing clothes, etc.).
- 4. I will always pay specific attention to people facing obstacles or difficulties in communicating or fully expressing themselves (related to impairment, mobility, gender or any other reason) by providing appropriate, adequate and safe communication spaces and tools.
- 5. I will never engage in any form of sexual relations with anyone under 18 years old, regardless of the age set by the sexual majority, the law or local customs putting in consideration that mistaking a child's age is not a defense and in any form of sexual relations or favors in exchange for money, gifts, job or humanitarian aid even if the person proposed this exchange in the first place, or is expecting it to happen. This applies in all circumstances, whether this person is identified as a prostitute, is being promoted by a third party as such or none of the two.
- 6. I will never sexually exploit a beneficiary or engage a child in labor (including domestic work) against access to aid, or any kind of benefit.

7. I will always treat beneficiaries/client or children in an equitable and fair way, never discriminating against them for example by favoritism or by excluding others.

- 8. I will never invite a beneficiary/client (especially a child), to my home or offer personal transport or maintain any private contact (telephone, social media) without any professional reasons and without clear permission from the people responsible
- 9. I will always ensure, when photography or video is taken with the proper authorization, which the person does not pose in a degrading manner or in a way that may be interpreted by others as having sexual connotations.
- 10. I will always ensure that all audio, written or visual communication respects the dignity and human rights of the person featured (including anonymity when necessary and for all children) and do not expose her or him to any risk of retaliation or abuse of any nature.
- 11. I will always ensure when taking and publishing photos that beneficiaries/clients or children are not naked or dressed in a manner which is not adapted to the situation in which they are represented.

I agree to ensure that all beneficiaries/clients (including children), employees, partners, community-based actors and any other people with whom I come into contact are treated with respect, dignity and equality and that I follow the policies and code of conduct to my best abilities.

## Annex 3: Incident Report Form Template

Please use the following to Templates to record and report an incident or disclosure. Please send it to your Safeguarding Focal Person in your SINA Community and to the Safeguarding Manager if you feel the case is severe.

Safeguarding-Incident Report Form		
Your Details:		
Name:		
Name of SINA Community and your roles:		
Date		
Contact Details		
(Phone and e-mail)		
Details of Incident / disclosure		
Date of initial raising of concern / incident		
Who raised the concern?		
○ Name		
<ul> <li>Contact details</li> </ul>		
Who is the vulnerable		
person		
<ul> <li>Age (if applicable in the case of Under 18)</li> </ul>		
• Contact details		
Where did the incident     occur?		

When did the incident	
occur?	
$\circ$ Date and time	
What happened?	
Were there witnesses?	
o Name	
Ago (if appliable in	
• Age (if applicable in	
the case of Under	
18s)	
<ul> <li>Contact datails</li> </ul>	
Who have you discussed	
this incident with?	
○ Name	
<ul> <li>Contact details</li> </ul>	
<ul> <li>Contact details</li> <li>Who have you discussed this incident with?</li> </ul>	