



Finn Church Aid

SAFEGUARDING POLICY

2024 ONWARDS



This policy replaces the ‘FCA Child Safeguarding Policy’ (10.10.2017) and the ‘Staff Policy to Prevent Sexual Exploitation in Humanitarian Response and Other Field Operations’ (22.07.2009) which will cease to apply on the effective date of this policy.

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DEFINITIONS AND ABBREVIATIONS

Definitions

Child	Any individual under the age of 18, irrespective of local country definitions of when a child reaches adulthood.
Complaint	An expression of dissatisfaction about the quality of delivery of FCA's work, FCA's actions or lack of action, or behaviour of FCA staff or anybody directly involved in the delivery of our work.
Misconduct	A breach against the Code of Conduct.
Safeguarding	A set of organisational policies, procedures and practices designed to ensure that no harm comes to people resulting of contact with an organisation's programmes, operations, or staff.
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.
Sexual harassment	Verbal, non-verbal or physical unwanted conduct of a sexual nature by which a person's psychological or physical integrity is violated intentionally or factually, particularly by creating an intimidating, hostile, degrading, humiliating, or offensive atmosphere.
Survivor	The person who is, or has been, sexually exploited or abused. The term 'survivor' implies strength, resilience, and the capacity to survive.
Whistleblower	In this document: A staff member who reports a misconduct. However, FCA also seeks to protect, as far as we can, those outside organisation reporting misconduct.

Abbreviations

ACT	Action by Churches Together
LGBTIQ+	Lesbian, Gay, Bisexual, Trans, Intersex, Queer, Asexual. The '+' represents minority gender identities and sexualities not explicitly included in the term LGBTIQ
OECD/DAC	The Organisation for Economic Co-operation and Development/Development Assistance Committee
SAC	FCA's Service and Accountability Centre, located in Helsinki, Finland
SEAH	Sexual Exploitation, abuse, and harassment

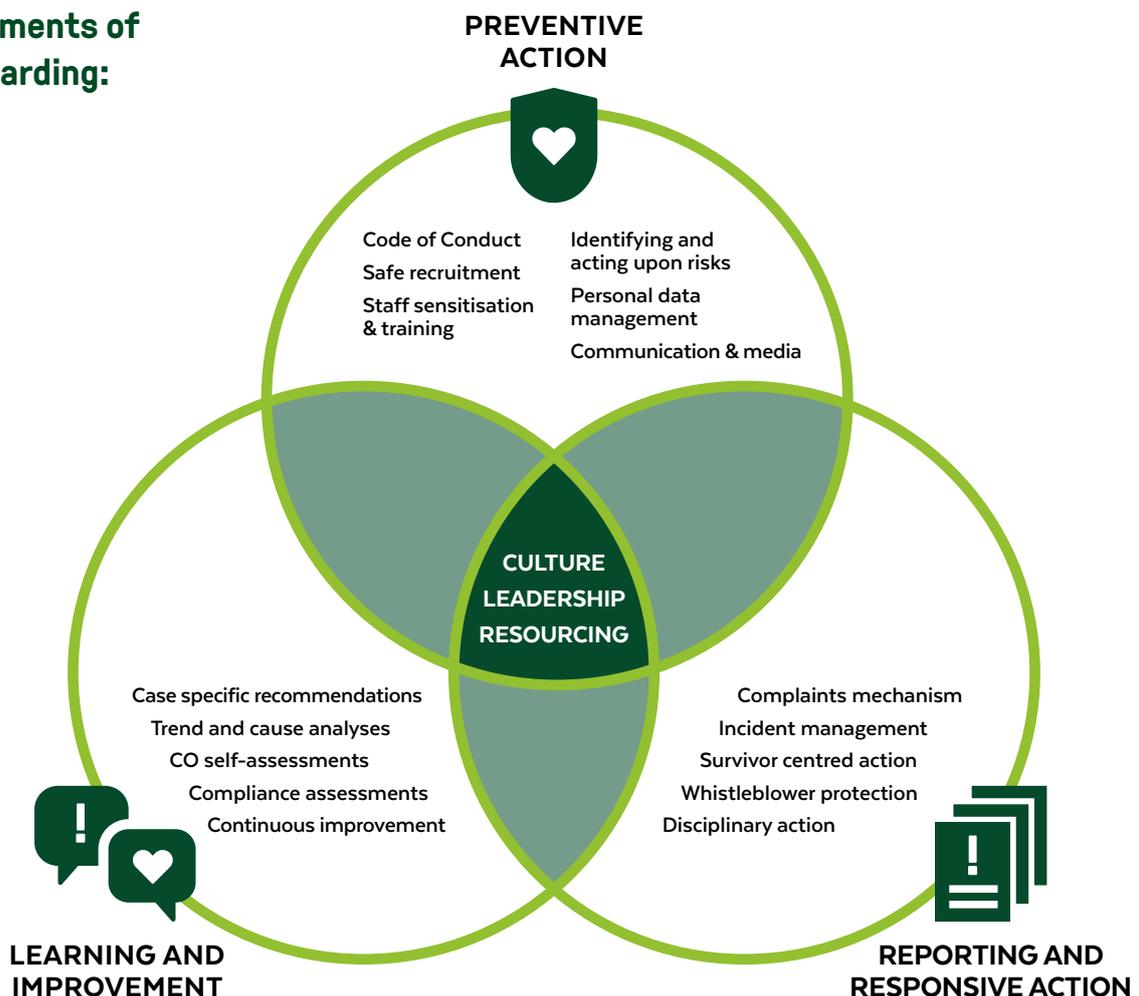
1. INTRODUCTION

As a rights-based organisation, FCA puts the people and communities we work with at the centre of our action. Within this policy, safeguarding means promoting and protecting the rights and dignity of these people and our staff, and enabling them to live free from harm, exploitation, and abuse.

AS A MEMBER of the international aid community, FCA is committed to the fundamental principle of ‘do no harm’. We work to ensure that our staff, operations, and programmes do no harm to children, vulnerable adults, and others, and do not expose them to any form of sexual abuse or exploitation. We also have the duty of care to ensure that our employees can work in an environment that is free from bullying, sexual and other harassment, and power abuse of all kinds.

Safeguarding is an integral part of the FCA’s risk management and programming. FCA’s approach to safeguarding consists of three strands of action: prevention, reporting and response, and learning and improvement. Safeguarding is a shared responsibility, but FCA management and leadership have a specific responsibility to promote the implementation of this policy and to monitor that the measures taken are effective.

Key elements of Safeguarding:



This policy is complemented by FCA Complaints Policy, which sets out the procedures and practices related to the 'Responsive Action' section below. The FCA Code of Conduct Policy defines the staff duties and expected behaviours, and supports the implementation of this policy.

This policy is informed by the Core Humanitarian Standard on Quality and Accountability (CHS) the Inter Agency Standing Committee (IASC) Working Group on Prevention and Response to Sexual Exploitation and Abuse Principles and related guidelines, and the International Child Safeguarding Standards by the Keeping Children Safe, as well by OECD DAC Recommendation on Ending Sexual Exploitation, Abuse, and Harassment in Development Cooperation and Humanitarian Assistance, the Policy on the Prevention and Elimination of Sexual Exploitation, Abuse and Sexual Harassment in Development Cooperation and Humanitarian Assistance by the Ministry of Foreign Affairs of Finland, and relevant policies of the ACT Alliance.



PURPOSE

The purpose of this policy is to affirm FCA's commitment to maintaining a safe environment for the individuals and communities we serve, and for our staff, by preventing sexual exploitation, abuse and harassment, and abuse of power.

This policy details the roles and responsibilities associated with safeguarding, and the framework through which FCA will establish and maintain a culture of safeguarding at all levels of the organisation.

SCOPE OF APPLICATION

This Safeguarding Policy is a mandatory policy that applies to all FCA Group staff, including employees, consultants, contractors, board members, project visitors, interns, and volunteers (hereafter referred to as FCA staff).

The policy also applies to partners delivering programmes together with or on behalf of FCA. It is our responsibility to ensure that these partners implement safeguarding procedures and practices in line with this policy.



2. PREVENTIVE ACTION

For the purposes of this policy, preventive action means identifying and minimising the risk of FCA staff, operations or programmes causing harm to people we work with, to FCA staff or partner staff, or exposing them to risk of harm.

FCA IS COMMITTED to assessing and mitigating risks at the project, country, and global levels, including risks related to the most vulnerable groups and individuals. Identified risks will be used to inform decision making and programming, including how safeguarding mechanisms must be implemented and resourced.

SAFEGUARDING AGAINST SEXUAL EXPLOITATION, ABUSE, AND HARASSMENT

Sexual exploitation, abuse, and harassment (SEAH) violates the rights and dignity of individuals. FCA has zero tolerance policy to SEAH, and employees found perpetrating such behaviour will be subject of disciplinary proceeding up to and including dismissal.

Senior managers and supervisors must ensure that staff are made aware of how to recognise signs of SEAH and how to report such incidents. It is the duty of staff to report SEAH concerns and incidents promptly through a complaints mechanism, or to safeguarding personnel.

An organisational culture in which staff feel safe from sexual harassment will be promoted. Staff must be made aware of how to raise concerns and access support if needed. Safeguarding staff must include both female and male representatives.

SAFEGUARDING CHILDREN

All children (persons under the age of 18 years) have equal rights to protection from harm and exploitation. Violence against children includes but is not limited to, physical or mental violence, injury and abuse, neglect

or negligent treatment, maltreatment, and sexual abuse. Children with disabilities and/or affected by disasters are particularly vulnerable but may also be at risk for reasons such as their gender, sexual orientation, ethnic origin, disability, or age.

FCA promotes equal treatment of all children. Decisions and actions affecting or likely to affect the welfare of children, must be taken in the best interests of the child. Whenever there is a conflict of interest, the needs and wellbeing of the child will always come first.

SAFE RECRUITMENT

FCA will do its best to protect the communities and people we work with, staff, and stakeholders, from individuals who may abuse their position. Safe recruitment processes will be used to minimise associated risks and will be applied to all employees.

The safe recruitment process will be incorporated into global and country specific HR manuals, guidelines, and other relevant guiding documents and procedures. This will cover all phases of the recruitment process, including job advertisements, job descriptions, candidate screening, induction, and mandatory trainings on safeguarding.

Given the challenges of rapid humanitarian surge responses, there may be considerable pressure to speed up the staff recruitment process. However, the urgency to fill positions must not compromise FCA's commitment to "do no harm". Even in emergency situations, recruitment must be based not only on skills only, but also on competencies, behaviours, and attitudes.

All staff must complete a safeguarding induction, and regular training and refresher courses that are relevant and appropriate to their involvement with FCA.

SAFE PROGRAMMING – RISK MANAGEMENT

Safe programming aims to ensure that, as far as possible, communities and individuals affected by FCA's work are safeguarded from harm caused by any intentional or unintentional risks arising from design or implementation of projects/programmes, or the behaviour of staff.

Safeguarding risks are assessed in a comprehensive and participatory manner as part of the regular risk assessment. The assessment will identify measures to reduce or remove safeguarding risks throughout the programme cycle and inform project/programme design and delivery. The project risk assessment feeds into the country risk assessment, and ultimately, the global risk assessment to inform decision making.

It is the responsibility of the country offices to ensure that sufficient human and training resources are dedicated to safeguarding at country and field location level, and that adequate budgets are allocated.

SAFE HUMANITARIAN ACTION

Humanitarian situations such as disasters and conflicts, present some of the highest risks of abuse, neglect, and exploitation. These risks are higher for groups such as children, adolescences, youth, women, persons with disabilities, older persons, internally displaced persons and refugees, ethnic minorities and LGBTIQ+ persons. To ensure that affected people are adequately protected, safeguarding practices will be integrated into all phases of FCA's humanitarian action – disaster preparedness, response, and early recovery – to meet our duty of care.

The provisions of this policy will be implemented by Country Offices as a means of institutional preparedness to respond to humanitarian crises, building a solid foundation and framework within which FCA staff and its partners work.

PROTECTING PERSONAL DATA

FCA processes personal and other sensitive data for a variety of purposes and follows specific data protection guidelines. Where not required by law, FCA also has a duty to ensure that no harm is done to people whose information we process. Failure to protect personal or other sensitive data violates people's rights and dignity and can put their integrity at risk.

Data relating to SEAH incidents and related investigations is highly confidential. Access to this data, including investigation reports is limited and only granted on a 'needs to know' bases (those who need to know receive the information they need to know).

The data must be transmitted only via secure file transfer services or other means, and stored in such a way that only authorised persons can access it. Material that is processed in its physical form must be stored and handled in secure facilities.

FCA complies with the European Union's General Data Protection Regulation (GDPR).

SAFE MEDIA, COMMUNICATIONS, AND RESEARCH PRACTICES

FCA follows ethical and safeguarding principles in research, media, and communications to ensure that children and adults are represented in a dignified manner, that their participation is not exploitative, and that photographs and related information are not used beyond the agreed purposes and consent.

Careless sharing of stories and images, especially in fragile contexts, can create risks for vulnerable people that we have not considered. Those most at risk include groups such as children in general, people living in conflict zones or as refugees, victims of natural disasters, survivors of gender-based violence, and sexual, ethnic, or religious minorities. Even personal social media posts with images/stories related to FCA's operation contexts cannot be considered private and should be in line with relevant FCA guidelines.

Specific FCA communication and media guidelines must be followed by all staff.

3. RESPONSIVE ACTION

For the purposes of this policy, responsive action refers to ensuring that people have a safe way to voice concerns and complaints, and that FCA uses clear and confidential processes to respond and to follow up on them. At FCA, this mechanism is called the Complaints Response Mechanism (CRM; complaints mechanism in short).

Misconduct investigations are part of the responsive action. They reinforce our commitment to 'do no harm', provide a formal process of checks and balances when misconduct occurs, and ensure that the needs and preferences of survivors are met.

COMPLAINTS MECHANISMS enable people to raise concerns and complaints about issues within FCA's control. Safe and confidential complaints mechanisms are an essential part of prevention of sexual exploitation, abuse, and harassment, and necessary for FCA to identify and respond to such incidents in a timely manner.

Care must be taken to ensure that complaints mechanisms are culturally appropriate and accessible to different groups of people, particularly children, women, and other vulnerable groups. Local complaints mechanisms must be designed in consultation with the communities and people FCA works with, as well as FCA staff. Communities and people affected by FCA's action must be informed about the expected behaviour of staff, their right to provide feedback and complain, and how to do so.

To ensure that SEAH incidents are adequately handled and investigated, all such concerns and complaints must be reported via FCA's global complaints mechanism, operated by SAC.

Safeguarding incidents must be reported to each donor in accordance with their respective requirements.

SURVIVOR-CENTRED APPROACH

FCA places the survivor's dignity, experiences, considerations, needs, wishes, and resilience at the centre of the handling of SEAH incidents. Any course of action that may endanger a survivor or result in re-traumatisation or re-victimisation must be avoided. Survivors may also face fear of retaliation or other risks related to their safety.

Those in responsible for a SEAH investigation must ensure that no harm is caused to survivors resulting

from investigation. It should be ensured that survivors have a supportive environment that promotes safety and empowers them to have a say in the investigation process, and that their health and welfare concerns and needs are addressed.

Potential safety, health, and psychosocial risks need to be identified prior to the investigation. The investigation manager in coordination with security personnel and country office safeguarding focal points, will organise access to services that meet the needs of the survivor. It is the responsibility of country offices to proactively identify and map service providers and referral pathways to ensure that relevant support services are readily available when needed.

WHISTLEBLOWER PROTECTION

Managers and supervisors have a duty to create an organisational culture in which all employees feel safe and comfortable raising concerns and reporting misconduct. All those handling concerns and complaints relating to sexual exploitation, abuse, and harassment must ensure that the information is treated in the strictest confidence. Risks to the safety and well-being of the whistleblower must be assessed and addressed before and during the investigation.

Any actual or attempted action to influence the survivor or the whistleblower by intimidation, retaliation, or other means will be considered gross misconduct and will be subject to disciplinary action, up to and including dismissal.

FCA complies with the European Union's Whistleblowing Directive.

4. WORKING WITH PARTNERS

FCA'S COMMITMENT to safeguarding extends to partners implementing projects with or on behalf of FCA. The safeguarding mechanisms and capacities of prospective partners are assessed during partnership assessments. In addition, due diligence reviews and other relevant assessments may be used to inform FCA of the partner's safeguarding capacity. FCA will work collaboratively with partners to assist them in

addressing any identified gaps and is required to provide advice where necessary.

Safeguarding obligations are set out in partnership and cooperation agreements. Partners are made aware that failure to comply with FCA's safeguarding standards is grounds for termination of the project cooperation agreement.

5. LEARNING AND IMPROVEMENT

FCA WILL PROMOTE internal learning and improvement on safeguarding by:

- Periodically reviewing FCA's performance against this policy, using relevant audits, evaluations, reviews, and assessments, and responding to identified needs and gaps.
- Analysing and acting on findings and associated recommendations from investigations into safeguarding incidents.
- Facilitating internal learning through the Safeguarding Community of Practice and other relevant internal forums.
- Seeking and acting upon feedback on the effectiveness of our safeguarding activities within FCA, and consistently identifying areas for improvement.
- Sharing and benefitting from learning in communities of practice and other relevant forums dedicated to promoting safeguarding in the aid sector.
- Continuously integrating international standards and best practice into FCA's policies, processes, guidelines, and practices.



6. IMPLEMENTATION AND RESPONSIBILITIES

All FCA employees are responsible for upholding and promoting this policy, but management and leadership have a particular role to play in promoting a culture of safeguarding where safeguarding is embedded at all levels of organisation, and in all programmes and activities.

MANAGERS AND SUPERVISORS play a critical role in safeguarding by ensuring that safeguarding procedures and practices are in place and being implemented. Managers and supervisors have the responsibility to create an environment in which staff to feel able to discuss safeguarding concerns and encourage them to report safeguarding issues. Managers also have a key leadership role in promoting safeguarding and demonstrating the organisation’s commitment through visible management actions to promote safeguarding.

MONITORING AND FOLLOW-UP

Implementation of the policy is regularly monitored by the global Safeguarding Manager and the country office Safeguarding/Complaints Focal Points. An annual summary report, including all concerns received, will be submitted by the SAC management team and to the Board of Directors through the Audit Committee.

ORGANISATION THAT IS SAFE FOR PEOPLE



RESPONSIBILITIES IN POLICY IMPLEMENTATION

Position	Key responsibilities
Board of Directors	Approving the Safeguarding Policy and the Complaints Policy and overseeing the establishment and maintenance of a safe organisation.
Audit Committee	Assessing the operation, effectiveness, and adequacy of FCA's complaints mechanism. Provide guidance and follow-up as appropriate.
SAC directors	Ensuring that this Safeguarding Policy and its provisions are fully embedded in their respective work domains such as HR procedures, communications, programming, compliance, budgeting, security, handling complaints and safeguarding incidents, and managing SEAH investigations.
Country Directors	<p>Ensuring country office procedures and practices are consistent with this Safeguarding Policy and the Complaints Policy.</p> <p>Ensuring that sufficient resources are allocated to safeguarding at country and field location levels, including the appointment and capacitation of Safeguarding and Complaints Focal Points, and allocation of safeguarding training budgets.</p>
Programme Managers, Programme Coordinators	Ensuring that programme/project design and implementation includes resources for safeguarding mechanisms.
Programme Managers, Area Managers where applicable, Safeguarding/ Complaints Focal Points	Ensuring that the people and communities FCA works with are aware of our safeguarding standards and the Code of Conduct, what behaviour they can expect from staff and how to report any concerns.
Safeguarding/ Complaints Focal Points	<p>Ensuring staff awareness raising on SEAH and complaints handling.</p> <p>Monitoring implementation of safeguarding procedures.</p>
SAC/CO grants management	Ensuring that safeguarding mechanisms, including complaints mechanisms, are appropriately included in funding proposals.
SAC and CO HR	Ensuring that recruitment and people management practices are included in HR guidelines/manuals and applied throughout the employment cycle.
SAC and CO HR, Supervisors	Ensuring that all new employees and volunteers receive an induction to safeguarding policy, and that all staff complete safeguarding training and regular refresher trainings relevant and appropriate to their engagement with FCA.

7. POLICY REVIEW

A **POLICY** is reviewed and if necessary, revised every three years, or sooner if required to reflect external safeguarding standards, whether national or international, and donor requirements. The process is initiated and led by the global Safeguarding Manager.



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