

Mojaz Foundation

Safeguarding Policy

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A.Introduction

Mojaz Foundation is committed to build a society where every individual has dignity and quality of life. It is recognized and ensured that anyone who comes into contact with Mojaz Foundation is protected from any form of injustice, discrimination, or abuse.

MF ensures that there are measures in place to make sure that beneficiaries and others who come into contact with our organization are protected from harm. MF strongly believes that Safeguarding is everyone's responsibility.

The Safeguarding Policy is aimed at specifying safeguards and procedures for the protection of children (anyone below 18 years of age) and adults (above 18 years of age).

The policy applies to all who come in contact with Mojaz Foundation. All adults who come into contact with children or other adults (particularly those at higher risks due to power imbalances or other vulnerabilities such as female staff, women in the community, transgender persons, PWDs¹, religious or ethnic minorities etc.) in our work have a duty of care to safeguard and promote children and adult's welfare. Safeguarding children and adults is thus defined for the purpose of this policy as:

- protecting children and adult from maltreatment, bullying, harassment, abuse, exploitation, violence or neglect while working with us including our beneficiaries and communities;
- taking actions for the prevention of any harmful (safeguarding) incidents; and
- responding to any such incident while extending best possible support to the survivors.

B.Scope

Safeguarding the children and adults during our work is important for the Mojaz Foundation. We strive to ensure that children and adults who receive our services are not vulnerable to exploitation, misconduct and abuse of power by:

- **All Mojaz Foundation Workers:** employees, interns, incentive workers, volunteers, contracted workers, consultants, and independent contractors
- **Visitors:** individuals hosted by Mojaz Foundation who are visiting our office and are not MF's workers (journalists, photographers, board members, donors, and others)
- **Sub-grantees, suppliers, vendors, and implementing partners**

This policy covers actions taken by such persons both during and outside of working hours. It applies to conduct in one's home, with family or community members, and other forms of personal relationships outside of their working relationship with the Mojaz Foundation.

This policy is binding for **all offices** and **working locations of Mojaz Foundation**.

C.Safeguarding Commitment

- Safeguarding policy is for the protection of any children or adult person who directly benefits from Mojaz Foundation implemented or financially supported program, otherwise known as 'a beneficiary.' This policy also protects other vulnerable adult persons and adult community members who Mojaz Foundation come in contact while implementing programs. It also applies to adults who work for the Mojaz Foundation against any

¹ Persons with Disability

maltreatment, bullying, abuse, exploitation, harassment of any kind or violence. The Mojaz Foundation holds the responsibility of 'duty of care' for any and everyone who in any way comes in contact with the Mojaz Foundation.

This policy provides guidance and direction to anyone associated with Mojaz Foundation so that:

- **All Mojaz Foundation staff** and other representatives understand the **importance of safeguarding**, and their responsibility to ensure that they and their work do not deliberately or inadvertently cause harm to rights holders and community members.
- All Mojaz Foundation staff and other representatives understand their **role in preventing** abuse, and the consequences of breaching this policy
- All Mojaz Foundation staff and other representatives understand their **responsibility to report** any concerns relating to abuse and have access to clear guidelines on how to report suspected abuse.
- All organizational processes and structures reflect our duty of care towards rights holders and the communities we work with and put in place procedures to safeguard them in every aspect of our work so that we build a culture free from abuse, discrimination, and harm.
- Mojaz Foundation commits to uphold the highest level of personal and professional conduct amongst its staff, contractors, volunteers, board members and partners working in or visiting all programming contexts, particularly humanitarian settings, **ensuring zero tolerance** of all forms of sexual exploitation and abuse against affected populations and in times of conflict, disaster and occupation.

i. Organizational Commitments

To comply with Safeguarding Policy, Mojaz Foundation commits to comply with the following:

- Designate safeguarding focal points at all offices and build their capacities in safeguarding and safeguarding policy
- Conduct background/criminal checks while selecting any staff, apprentices, interns, trustees, consultants, vendors, and volunteers working with children or adults and acquire at least two appropriate references
- Raise the awareness of relevant staff and volunteers on protection issues through trainings, conduct and regularly update safeguarding risks assessments
- Respond swiftly and appropriately to all suspicions or allegations of abuse, and ensure confidentiality of all data and information

When conducting any activities and events that involve children or adults:

- Conduct risk assessment to identify key risks and respective mitigation measures (particularly while working with or for children, women, transgender persons, religious or ethnic minorities etc.)
- Take mitigation measures effectively
- Ensure that all key people involved in such activities or events know this policy and its various requirements and provisions well

ii. Staff Commitments

It is particularly important for all staff, vendors, contractors, volunteers etc. whoever works for or represents the Mojaz Foundation that they comply with the safeguarding policy. This must be clearly understood that Mojaz Foundation has a zero-tolerance approach to all forms of exploitation and abuse of children and adults.

To contribute into promoting a safeguarding culture, the staff and others working with Mojaz Foundation must commit to the following:

Acceptable Behaviour

All staff, visitors, sub-grantees, suppliers, vendors, and implementing partners must:

- Learn Mojaz Foundation safeguarding policy; and get themselves well-versed with various provisions made in the policy to adapt and practice them in day-to-day work and even beyond
- Treat all children and adult with respect
- Respect their privacy
- Avoid any situation or circumstances that put any child or adult into an uncomfortable situation due to certain attitude, behaviour or specific actions including physical, online, digital, verbal etc.
- Ensure compliance to the policy with appropriate portrayal of behaviour even beyond office hours
- Obtain informed consent from adults or informed assent from children before taking their photographs and use them only for the purpose that was explained to children or adults while securing their consent/assent
- Keep all personal data of children and adults confidential
- Make all efforts to minimize the risk of harm to children and adults
- Report suspicions or allegations of exploitation and abuse or the policy violation in accordance with the Mojaz Foundation reporting procedures

Monitoring & Reporting Safeguarding Concerns

This is prime responsibility of and obligation on all staff (including volunteers, vendors, contractors, consultants etc.) to be vigilant to any intentional or unintentional safeguarding concerns which may raise in our day-to-day business. All staff must make efforts to learn safeguarding policy and respective provisions. They should approach their supervisors, HR or safeguarding focal points to clarify any ambiguities. Monitoring safeguarding concerns is a shared responsibility and should be done without any time or geographical jurisdictions/restrictions as long as it involves any persons associated with the organization in any capacity including our beneficiaries.

Similarly, Mojaz Foundation is committed to ensuring that any and every safeguarding concerns are reported, investigated, and responded to in a timely, fair, transparent and consistent manner. As and when anyone associated with Mojaz Foundation in any capacity or any beneficiary or community-member experiences, witnesses or gather any doubts of safeguarding concern or safeguarding policy violations; they must raise it using either of the safeguarding reporting channels.

Reporting Safeguarding Concerns (Reporting Channels)

Staff, vendors, contractors, consultants, community members or anyone associated with Mojaz Foundation can report the safeguarding concern using any of the below channels. Please note that reporting safeguarding concern is mandatory; failure to which can lead to a disciplinary action. Therefore, it is critically important that whenever anyone develops a concern related to safeguarding, they must report.

- Raise a concern using complaint boxes placed at all field locations and Mojaz Foundation offices.
- Raise a concern through calling at 03121122338
- Raise a concern by emailing us at complaints@mojazfoundation.com
- Raise a concern by approaching to one of the below safeguarding focal points:
 - Mr. Abdul Samad
 - Ms. Saadia Iqbal
 - Ms. Mehwish Rasheed
- Raise a concern through your supervisor
- Raise a concern directly with the CEO
- Raise a concern with the board member if the allegation is against the CEO her/himself

Mojaz Foundation follows a survivor-centred approach for responding to any safeguarding concern.

D.Responding to Safeguarding Concerns

Whenever any safeguarding incident takes place or a concern is raised; and is reported through any means, the following measures will be taken:

- Forward the incident details to the safeguarding focal points
- Call for emergency services (such as ambulance etc.) if the survivor is in the need of immediate medical attention
- Safeguarding focal point should gather initial information about the incident and share with CEO /Executive Director of the organization.
- CEO/ED will constitute a committee of 3-5 persons with at least 50% females' participation in the committee for investigations.
- The investigation committee has two major roles:
 - To validate the allegation with best possible evidence
 - To ensure that survivor of safeguarding incident is extended proper and all required support ensuring survivor's best interest
- The committee should conduct immediate meeting to plan the investigation, agree on various questions and who among them shall be most appropriate to ask those questions, and who are the key people to talk to for the purpose of establishing facts.
- Committee should complete its investigation within 3-5 days whereas can take a maximum of 20 days for complicated or most challenging safeguarding incidents.
- Committee should also analyse if survivor needs referrals to any other organization or government agencies. If yes, the committee considering survivor's best interest, will make referrals and subsequent follow-ups. In specific situations, committee can request for the technical expertise from the relevant programme staff while ensuring confidentiality.
- At all times and costs, committee will not disclose the data or any information to anyone and will share their final report with the CEO/ED only for further actions in accordance with HR procedures, safeguarding and other relevant policy and procedures.

E. Breach of Safeguarding Policy

This must be particularly noted that any breaches to Safeguarding Policy can lead to serious consequences ranging from suspensions and termination of contracts to lawsuits. Depending upon nature of the case, various measures shall be adapted ensuring that survivor of the safeguarding incident is safe and secure; and the alleged is not able to influence the investigation process. The Mojaz Foundation's management may decide to suspend the alleged employee for an indefinite period and until the investigation is complete if they deem necessary to do so. If proven guilty, the disciplinary actions may include but not limited to warning letter, transfers, termination of contract, barring certain employee for any future employments with Mojaz Foundation and even a lawsuit if the nature of case requires a legal intervention.

F. Safeguarding Policy Review

The Safeguarding Policy has been drafted and approved on 17th November, 2022. The policy will be reviewed annually for necessary revisions and/or to address any emerging contextual needs. The next review date of Safeguarding Policy is 30th December, 2024.

Annexure A: Key Safeguarding Terms & their Explanation

Key important terms commonly used in safeguarding backdrop are explained below. However, if there is still a lack of clarity or a term is not defined, staff should contact the respective Safeguarding Team or Focal Point for advice and further clarification.

Abuse World Health Organization defines ‘abuse’ or ‘maltreatment’ that it constitutes all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the individual’s health, survival, development or dignity in the context of a relationship of responsibility, trust or power².

Adult Any individual aged 18 and older.

Adult at Risk People aged 18 years or over who identify themselves as unable to take care of themselves or protect themselves from significant harm or exploitation; or are understood to be at risk, which may be due to frailty, homelessness, mental or physical health problems, learning or physical impairments, and/or impacted by disasters or conflicts.

A few of the examples of such vulnerabilities that pre-exist in our context (or adult-at-risks) include but are not limited to female staff, and young and fresh employees who are not well-acquainted with policies in organizational context, whereas women, transgender persons, PWDs, religious or ethnic minorities, those affected by any disasters or facing severe economic crisis etc. in community contexts.

Allegation An oral or written declaration of wrongdoing or an assertion of misconduct or criminal behaviour, the validity of which has not been established

Bullying (including cyber bullying) An act of aggressive behaviour in order to intentionally hurt another person or persons, mentally, physically and/or sexually usually repeated over time in physical or digital space (cyber bullying).

Child Anyone who has not yet reached their 18th birthday, irrespective of how a child is defined under the national law.

Discrimination To treat a person or a group of people less favourably than others for example, on the basis of race, nationality, disability, age, gender, sexual orientation, ethnicity or race, religion or belief.

Domestic Violence Controlling, threatening, degrading or violent behaviour between people who are or have been, intimate partners or family members.

Harassment Aggressive pressure or intimidating behaviour

Institutional Abuse Maltreatment of a person in an alternative residential care, educational or other institution.

Physical Abuse Assault, rough handling, pushing, hitting, spitting, slapping, punching, kicking, biting.

Psychological Abuse Persistent emotional ill-treatment of a person such as to cause severe and long-lasting effects on a person’s emotional and psychological development these can include threats, humiliation, name calling, blaming, constant criticism, shaming, bullying, swearing, verbal abuse or enforced isolation. It can take place online physically in real time.

² Definitions of Physical abuse, Domestic violence, Sexual abuse, Psychological abuse, Modern slavery, Discrimination, Unjustified discrimination, and Institutional abuse are taken from British Council Adult at Risk Policy <https://britishcouncil.sharepoint.com/Site/Diversity/Shared%20Documents/Adults%20at%20Risk%20Policy.pdf>

Safeguarding Safeguarding is defined as the actions taken by an organisation to protect children and adults from abuse in all activities including online engagement. the protection of people in the environment from harm, abuse and exploitation; avoiding harm to people or the environment; protecting people and the environment from unintended harm Safeguarding is integral to the design, development and delivery of the Aawaz II project with established processes and systems to promote and mainstream prevention of abuse and SEAH occurrences such as safe recruitment, safeguarding reporting and response mechanism etc.

Sexual Abuse Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It covers sexual assault (attempted rape, kissing / touching, forcing someone to perform oral sex / touching) as well as rape. In case of children, this also includes non-contact activities, such as involving children in looking at pornography, in making indecent images of children, or encouraging children to behave in sexually inappropriate ways.

Sexual Exploitation Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. Includes profiting momentarily, socially, or politically from sexual exploitation of another.

Sexual Harassment A continuum of unacceptable and unwelcome behaviours and practices of a sexual nature that may include, but are not limited to, sexual suggestions or demands, requests for sexual favours and sexual, verbal or physical conduct or gestures, that are or might reasonably be perceived as offensive or humiliating³.

³ Definitions of Sexual Exploitation, Sexual Abuse and Sexual Harassment are taken from “UN Glossary on Sexual Exploitation and Abuse 2nd Edition”
https://hr.un.org/sites/hr.un.org/files/SEA%20Glossary%20%20%5BSecond%20Edition%20-%202017%5D%20-%20English_0.pdf

Annexure B: Code of Conduct

This Code of Conduct provides expected standards of behaviour staff, volunteers and contractors towards children and adults, including all beneficiaries of our programmes' work such that any contact is positive and appropriate, and keeps children and adults safe. The Code applies to conduct in both staff's professional role and in their personal lives; and should be signed by all staff at the time of their recruitment and later annually. It should be noted that in case of breach of following Code of Conduct, Mojaz Foundation would initiate follow up action, including possible disciplinary action:

In order to prevent exploitation, abuse and harassment, Mojaz Foundation subscribes to the following principles that you must follow:

1. Sexual activity with children (persons under the age of 18) or another adult associated with the organization (persons above age of 18) is prohibited. Mistaken belief regarding the age or consent of a child is not admissible in investigation or disciplinary action or in defence.
2. Marrying a child below the age of 18 is prohibited.
3. Abuse (including sexual exploitation) to any child or adult constitute acts of gross misconduct and will be subject to appropriate disciplinary action including dismissal.
4. Sexual relationships among staff and between staff and any adult beneficiaries of Mojaz Foundation programmes are not allowed.
5. Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited. This includes exchange of any assistance that is due to children or adults with whom we work.
6. Sexual harassment, including but not limited to actions such as sexually suggestive gestures, comments on a worker's appearance, age or private life, sexual comments, stories and jokes or unwanted sexual advances will be subject to appropriate disciplinary action.
7. Staff and contractors are obliged to create and maintain an environment which prevents abuse including sexual exploitation and harassment; and promotes the implementation of this code of conduct. Management staff at all levels have particular responsibilities to support and develop systems which maintain this environment.
8. Staff and contractors should report any concerns relating to the safety or welfare of a people they are in contact with to the local manager or your line manager.

When working with children YOU MUST ALWAYS:

1. Conduct interactions with children that are safe, appropriate, child-friendly and sensitive to the feelings of the child.
2. Be familiar with the procedures for reporting concerns or incidents at the Mojaz Foundation.
3. Immediately report any concerns relating to the safety or welfare of a child you are in contact with to the local manager or your line manager.
4. Avoid working alone with children and plan your work so that at least two adults are present at any time.
5. Behave appropriately; make sure that language is moderated in their presence and refrain from adult jokes or comments that may cause discomfort or offence.

6. Avoid inappropriate physical contact with a child for example if a child is hurt or distressed, comfort or reassure him/her without compromising his/her dignity.
7. Be sensitive to local norms and standards of behaviour towards children.
8. Listen to what the children are saying and respond appropriately.

When working with children YOU MUST:

1. Never act in a way that may be abusive or may place them at risk of abuse.
2. Not condone, or participate in, behaviour of a child that is illegal, unsafe or abusive.
3. Never hit or otherwise physically assault, harm or abuse them.
4. Not develop physical/sexual relationships with them.
5. Never verbally or physically act in a manner that is inappropriate or sexually provocative, intended to shame, humiliate, belittle or degrade children or perpetrate any form of emotional abuse, discriminate against or favour particular children.
6. Not develop relationships with them that could in any way be deemed exploitative or abusive.
7. Not use language, make suggestions or offer advice that is inappropriate, offensive or abusive.
8. Never allow allegations made by a child or concerns expressed by others about their welfare, to go unrecorded or not acted upon.
9. Not do things for a child of a personal nature that they can do for themselves.
10. Not have a child with whom you are working stay overnight at your home or other personal accommodation in which you are staying.
11. Never use any computer or other electronic device to view, download, distribute or create indecent or inappropriate images of children.

Declaration

I _____ fully understand and agree to abide by the attached Code of Conduct and provisions made in Mojaz Foundation Safeguarding Policy, including all its annexes. I understand that any breaches of the Code of Conduct and the policy will be reported to the respective Safeguarding Focal Point or higher management and appropriate action will be taken in accordance with the relevant policies and procedures.

☐ I have read the attached policy and all the annexes

☐ I agree to notify the Mojaz Foundation immediately if any reason or allegation arises (within or outside my Mojaz Foundation work) that may or may be perceived to bring into question my suitability to work with children or beneficiaries.

Signature: _____ Date: _____

Annexure C: Examples of Safeguarding Scenarios

1. A staff member comes late every day to the office however he uses the backdoor so that his supervisor does not notice it. Is it a safeguarding concern?

Response: No. This can be a disciplinary issue and organization may have separate procedures to deal with that.

2. You find one of your team members going to field visits quite often. He mostly visits one specific field site more than the other sites. Whenever you ask, he shares quite a list of tasks that he must complete, but you still don't feel comfortable with his routine. What will you do?

Response: This may or may not be a safeguarding concern. You may choose to ascertain if his list of tasks is valid and justified. If yes, you should not interfere with the routine but if not, you may choose to discuss with your supervisor or safeguarding focal point before raising a concern.

3. You have concerns that one of the volunteers is taking money from other beneficiaries using Mojaz Foundation and promising them with some benefits. Will you investigate this further or report using safeguarding channels?

Response: This is a serious violation and is exploitation of the beneficiaries. This should be immediately escalated using safeguarding reporting channels.

4. One evening, you get a call from one of the beneficiaries who tells you that she has been assaulted by one of your colleagues. What will you do?

Response: This is a serious safeguarding violation and concern. You must immediately report it and engage your safeguarding focal point. The focal point may decide to establish an immediate contact with the beneficiary to see what support or assistance she may need. In this specific case, survivor-centred approach supersedes all other businesses.

5. One of your male colleagues often another female colleague on some pretext or the other. You clearly see that the female colleague is uncomfortable with this behaviour. You approach female colleague and she confirms your concerns. However, she is afraid to report it because the male colleague is more senior and older in the organization. What will you do?

Response: Provide the female colleague confidence and assure her of your support. Let her know that you have safe and confidential procedures to report such cases and policy applies to all. Also tell her that the organization follows a survivor-centred approach so her interest will be of prime priority and no further harm shall reach her. Organization will take all possible measures to ensure her safety. Report the concern using one of the safeguarding reporting channels.

6. You get the information from your field team about a case of early marriage in one of your programme field sites. It's a girl who is the daughter of one of your beneficiaries. Is this to be dealt accordingly to your organizational safeguarding policy and procedures?

Response: No, this is a protection concern and will be dealt through programmatic procedures, community-based systems and referral mechanism. Safeguarding policy and procedures only apply to those who have any kind of written contractual agreement with your organization such as staff, volunteers, consultants, contractors, vendors, service providers etc.

7. One day you visit the organization's warehouse to check the samples of some material. While you are checking the samples, you find a truck that reached the warehouse and started offloading some other material ordered by the organization. You see two boys who seem to be teenagers engaged in offloading. Do you see anything wrong with this? What will you do?

Response: Yes, this is likely to be a child labour case and supplier doing business with your organization is bound to follow your safeguarding policy. You must report it using one of the safeguarding reporting channels.

8. One of your staff members gets to know about a colleague who has been sexually harassing a few female colleagues now and in the past. She decides to write an email about this colleague to the donor without discussing anything with anyone in the organization bypassing the established safeguarding focal points and reporting channels. During investigation or afterwards, should she also be warned or penalized for breaking the protocols and not using organizational channels?

Response: No, do not retaliate against a complainant. Anyone who raises a concern with a good intention cannot be penalized for this however encourage the staff to trust the internal safeguarding reporting and investigation systems. Confidentiality and neutrality should be prime principles in safeguarding.

9. Your team frequently visits the field. Your policy does not allow the field teams to take any benefits from the beneficiaries. But when your team visits the field, they are most of the times pressurised by the communities to have lunch or tea with them. Is it a safeguarding concern?

Response: No, this is not a safeguarding concern unless your staff demands beneficiaries to arrange lunch or tea for them. As NGOs, we work in diversified cultural settings; and many such cultures have these as traditions which are to be respected and honoured. However, you need to keep reminding yourself and your teams to say NO to such offers and make best possible efforts to avoid such situations in a humble and respectful manner.

10. You are interviewing a few of the candidates for a manager level position. During the interview, one of the candidates is found to be technically strong. As you finalize the candidates and check references, you come to know that there was reported case of sexual exploitation of a beneficiary against him in his past organization. The investigation was conducted but he was not proven guilty. However, he still left that organization and decided to join your organization at a lower position and salary. Even when you had asked about this unusual decision in the interview, he couldn't provide a logical or clearer response. Will you hire him, not hire him or will discuss with him or his previous organization openly and in detail?

Response: You should not hire him immediately. Serious concerns have been raised therefore you should openly discuss this with the candidate and let him/her know that you would further gain information about it. If you are unable to find any clear and straight information which proves that the candidate was not guilty, don't hire him/her.

11. One of the male team members approaches you complaining about his supervisor who is a female. He says that his supervisor humiliates him in the meetings and discussions; and discourages him in day to day to work by making negative comments. One of the common comments that she makes is that she would not extend his contract as he is not able to perform up to the mark. Is it a safeguarding concern or not? What will you do in this situation?

Response: This is likely to be a safeguarding concern of harassment by the supervisor. This needs further investigation. You should let the respective colleague know that he can report it using one of the safeguarding reporting channels. However, if the colleague is reluctant, you can also provide him an option to organize a discussion with his supervisor raising the concern (through you or HR) and organize a follow-up joint meeting to resolve the issue. If the issue remains unresolved and you are not able to establish clear facts as who is at fault or situation doesn't seem to get improved, report it using safeguarding channels.