

**GP 04**

Safeguarding Policy

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Author:	SGSE Executive Team
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PURPOSE

This policy affirms the organization's commitment to safeguarding principles for beneficiaries. Its principles and obligations encompass all forms of potential harm—physical, psychological, and economic—that may affect individuals in general, such as harassment (including bullying), exploitation, and abuse, with particular emphasis on sexual harassment, exploitation, and abuse.

Additionally, this policy serves as the primary reference for any case involving a breach of safeguarding within the organization. It outlines the reporting and response mechanisms, key standards and definitions, as well as the procedures for reviewing, evaluating, amending, and approving the policy.

SCOPE

This policy applies to everyone connected to SEEN, including: - Board members - Staff - Volunteers - Contractors and consultants - Partners - Service providers - Beneficiaries - Any individual interacting with SEEN within physical or digital spaces.

The Executive Director oversees implementation, while the Board of Directors is responsible for reviewing and approving this policy.

DEFINITIONS

This includes an explanation of terms and abbreviations used within the policy and procedure.

Word/Term	Definition
Safeguarding	<p>Safeguarding refers to protecting individuals from any harm resulting from their association with the organization, regardless of their role or status. This includes members, volunteers, beneficiaries, partners, service providers, and any individuals from the wider community who engage with the organization, its staff, or its programs.</p> <p>We define safeguarding as the precautionary measures taken to protect the rights of individuals, particularly those at greater risk of harm. The aim of safeguarding is to prevent abuse, neglect, and exploitation by creating a safe environment and taking immediate</p>



action to address any concerns. Safeguarding is a collective responsibility that promotes the safety and well-being of individuals and ensures their physical, emotional, and mental security.

Abuse

Abuse refers to any act or behavior considered inappropriate or harmful, causing damage to another person physically, emotionally, or socially. It may include actions such as physical violence, verbal assault, bullying, discrimination, exploitation, threats, or any conduct that leads to harm, humiliation, or distress.

Exploitation

Exploitation refers to the unfair or unlawful use of a person or their resources, typically for personal gain at their expense. It may involve misusing power, influence, or authority to control others or achieve self-interests at the cost of their well-being.

Principle of Do No Harm

This principle means avoiding placing individuals at risk through our actions, behavior, or communication with them. It forms a core foundation of the safeguarding policy, ensuring that all members of the organization (volunteers, staff, board members, etc.) commit not to cause any form of abuse, exploitation, or harm to any beneficiaries connected to the organization's work.

Informed Consent

Informed consent refers to a voluntary and well-informed agreement by an individual to participate in a particular activity or procedure after receiving clear and sufficient information. This information should include relevant details about potential risks, benefits, and available alternatives.

The purpose of informed consent is to ensure individuals can make independent decisions based on their full understanding of the situation. It upholds their rights, dignity, and autonomy in decision-making.

In situations where staff members lack adequate information about a matter (e.g., external services provided by another organization), they must exercise maximum transparency by clearly stating that they do not have sufficient knowledge about the safety, acceptance, or risks involved.

It is essential to provide accurate information to beneficiaries and notify them when certain details are unavailable, leaving them free to make their own decisions regarding next steps. Under no circumstances should staff make decisions on behalf of beneficiaries. Any decision made without informed consent or on their behalf constitutes a clear breach of the safeguarding policy, the code of conduct, and the principle of respecting individual autonomy.



POLICY

1. Affirmations and General Principles:

SEEN for Gender and Sexual Equity affirms its awareness of the existing imbalances of social power that grant privileges to certain social groups over others and recognizes how different forms of marginalization can intersect and compound, making some individuals more vulnerable to harm.

This heightened risk may arise due to people's temporary or permanent circumstances, identities, or affiliations, including—but not limited to—discrimination based on sex/gender, sexuality, ability, age, maturity, race, ethnicity, national or regional origin, cultural or linguistic identity, economic status, housing or stability conditions, and other related factors.

SEEN strives to ensure that its activities and spaces are safe for all individuals, free from all forms of harassment (including bullying), exploitation, and abuse rooted in these systems of social marginalization. The organization is committed to preventing such incidents and to responding seriously and effectively should they occur, regardless of whether the violation is a one-time or repeated occurrence.

Furthermore, SEEN acknowledges that institutional work particularly within humanitarian and relief contexts often creates unequal power dynamics among individuals, whether through employment roles, volunteer responsibilities, or organizational hierarchies. The organization recognizes the potential harm that may result from the misuse of this power or from failing to acknowledge the realities of these social and functional power imbalances.

2. Organizational Commitments

SEEN for Gender and Sexual Equity acknowledges its responsibility and capacity to protect individuals from harm in the context of their engagement with it, whether through their contact with the organization, their work in its programs, their presence in its physical or virtual spaces, or their benefit from its services. The organization is committed to making every possible effort to ensure their safeguarding and to enhancing its capacity to do so by developing its policies, procedures, and ensuring the availability of necessary resources, in order to avoid causing harm as a result of its program design or implementation, to identify and respond to any harm should it occur, and to support affected individuals in recovering from such harm and seeking justice through the available channels of their own choosing.

SEEN strives to ensure that its policies and procedures prioritize the agency of every individual who has experienced harm, respecting their willingness and readiness to disclose what happened, their decision on whether to seek justice, and their preferred form of justice and the processes they wish to follow. SEEN also emphasizes its respect for self-identification, whether an individual defines themselves as affected, victim, survivor, or by any other term, and considers all such identifiers equal wherever they appear in the organization's policies, procedures, or public communications.

In addition to the general safeguarding principles and commitments set forth in this policy, SEEN is also committed to upholding its related internal policies.



3. Commitments of Organization Members in Their Various Roles

The safeguarding policy is considered the responsibility of all individuals affiliated with the organization, regardless of the type or scope of their tasks and responsibilities, and this policy forms an essential part of the Code of Conduct.

In this section, we outline some of the key commitments required from individuals in their different roles.

3.1 Board Members:

The Board of Directors is responsible for approving the safeguarding policy, ensuring its dissemination to all individuals within the organization, and making sure that everyone has the necessary information and capacities to avoid causing any harm to beneficiaries. The Board is also responsible for reviewing the policy every two years (or earlier if needed) and working on revisions in collaboration with the individual responsible for and specialized in safeguarding policies. The Board affirms that attendance at safeguarding policy trainings is mandatory for all members of the organization, including all board members.

In certain cases, some board members may also participate in an investigation committee for any report indicating a breach of the safeguarding policy.

3.2 Staff / Volunteers:

Staff members and volunteers are responsible for attending the necessary trainings, reading and understanding the safeguarding policy, and implementing it in their work. They must seek support whenever needed and ensure that their work practices avoid causing any form of harm to beneficiaries. They are also responsible for disseminating the safeguarding policy within the communities they work with. The level of responsibility may vary from one individual to another; those in decision-making positions carry different responsibilities compared to those involved in program implementation.

Therefore, the implementation of the safeguarding policy includes the following:

- Making decisions that are aligned with the safeguarding policy and do not violate it at all levels (mission, vision, projects, human resources decisions, funding, training, etc.).
- Implementing activities that respect the policy and uphold the dignity and respect of the organization's beneficiaries.
- Ensuring a clear understanding of the policy, its importance, and how to apply it in practice.
- Respecting the beneficiaries' freedom of choice and avoiding judgment of their decisions (Agency and Autonomy).
- Ensuring the application of informed consent principles and guaranteeing the protection, safety, dignity, and freedom of individuals in making their own decisions.

When implementing the safeguarding policy, there may be challenges in determining the extent of an individual's responsibility within the organization due to the multiple roles they may hold. Therefore, the primary responsibility of any individual is tied first and foremost to their conduct and actions in relation to their practical role, rather than to their job title. Similarly, the practical procedures of the policy focus less on official positions and more on the impact of individuals'



behavior on the communities the organization works with, as well as the potential harm their actions may cause to these communities.

4. Safeguarding Focal Point:

The primary responsibility of the safeguarding focal point is to ensure the effective implementation of the safeguarding policy, which includes both training and continuous monitoring.

This role involves:

Training all members of the organization on implementing the safeguarding policy. Receiving reports related to safeguarding concerns and overseeing the investigation processes. Actively participating in decision-making when a breach of the safeguarding policy occurs. However, these decisions are not made individually but rather within a committee

In certain exceptional cases, the safeguarding focal point may be excluded from specific investigations, decisions, or even the reporting process. Such cases may include:

- 4.1. When the focal point themselves is the person accused of breaching the policy.
- 4.2. When the person submitting the report or the person accused has a close personal relationship with the safeguarding focal point.
- 4.3. When the person submitting the report or the person accused is the direct supervisor/manager of the safeguarding focal point.

5. All individuals, regardless of their responsibilities, are required to report any case of a safeguarding policy breach. This applies in the following situations:

- 5.1. When an individual witnesses any behavior that violates the safeguarding policy.
- 5.2. When an individual is informed by any beneficiary that there has been a breach of the policy (in such cases, the beneficiary must be informed about the existence of the policy and the reporting channels, and the incident must be reported).
- 5.3. When an individual suspects that a policy breach may have occurred (even in cases where it is not confirmed).
- 5.4. When an individual feels they may have breached the policy and is uncertain about their conduct, they may approach the safeguarding focal point to seek support and guidance.

6. Prevention and Risk Assessment

6.1. Individual Behaviors:

Below are examples of behaviors by staff members or volunteers towards beneficiaries or any individual in contact with the organization that are considered breaches of the safeguarding policy. It is important to note that the level of risk cannot be assessed in isolation but rather within the context in which these behaviors occur on the ground. Therefore, each case will be evaluated individually to determine the degree of harm or risk and the appropriate response.

Examples of behaviors that constitute a breach of the safeguarding policy include:



- Any form of abuse, whether verbal (e.g., shouting, insults), physical (e.g., hitting), or sexual (e.g., harassment, sexual gestures, or similar behaviors).
- Any form of exploiting power over beneficiaries, including acting with superiority or taking advantage of their needs for personal gain.
- Providing false or inaccurate promises to beneficiaries.
- Any form of breaching the privacy of beneficiaries.
- Withholding information from beneficiaries that could potentially put them at risk.
- Providing incomplete or unverified information to beneficiaries.
- Making decisions on behalf of beneficiaries without obtaining their informed consent.
- Any form of negligence that could expose beneficiaries to harm or danger.

In general, any behavior that could potentially cause harm to individuals by staff members or volunteers is considered a breach of the safeguarding policy. If any individual is uncertain about a situation or needs guidance, they are encouraged to seek support by contacting the safeguarding focal point or the appropriate person within the organization.

6.2. Prevention Steps:

SEEN is committed to taking essential prevention measures to ensure that all staff members and volunteers within the organization have both the necessary capacities and the intention to avoid causing harm to beneficiaries or to individuals interacting with the organization.

To achieve this, the organization undertakes the following steps:

- Developing and continuously reviewing the organization's internal policies, including the safeguarding policy.
- Disseminating the safeguarding policy within the organization and among the local communities it works with or engages.
- Promoting a culture of protection and safeguarding among all individuals.
- Providing continuous training for all staff members and volunteers on the internal policies and the Code of Conduct.
- Conducting regular monitoring, evaluation, and review.
- Amending any provisions of the policies when necessary, especially those related to the protection and safeguarding of individuals.
- Verifying the background of new staff and volunteers by reviewing their previous workplaces as part of the organization's recruitment policy.

7. Reporting and Response Mechanism

7.1. Reporting Mechanism

Duty to Report:

Reporting is a mandatory obligation for all individuals affiliated with the organization (board members, staff, volunteers, contractors, etc.). Every individual is responsible for reporting any incident mentioned in the previous sections. Failure to report is, in itself, considered a breach of the safeguarding policy.



For beneficiaries, they have the right to report any safeguarding concern through the available channels listed below. However, no one can be forced to submit a report. The organization, nonetheless, is committed to promoting a culture of safeguarding among the communities it works with, without infringing on the rights or dignity of individuals.

If a beneficiary informs any staff member or volunteer of a safeguarding breach, the staff member must report it. However, informed consent is required when mentioning the incident details and the name of the person involved. It is also essential to assess any potential risks associated with the reporting process.

There are two possible scenarios:

- If the beneficiary consents: The staff member reports the case through the available channels, including details, the beneficiary's name, and contact information.
- If the beneficiary does not consent: The staff member reports the case without including any details or personally identifiable information.

In addition, the safeguarding focal point is responsible for overseeing the reporting and response process and ensuring it follows the correct procedures outlined in the policy. Any negligence, delay, or failure to respond to a report constitutes a serious breach of the safeguarding policy and can itself be reported to the secondary safeguarding focal point, as specified in the section on reporting concerns involving the safeguarding focal point.

7.2. Privacy and Confidentiality

All reports must be handled through secure and accessible channels that fully respect the principles of privacy and confidentiality for all individuals involved. This is essential to ensure their protection and dignity. It is therefore crucial that the safe reporting steps outlined in this policy are strictly followed. Failure to follow proper reporting procedures by any organizational member is considered a breach of the safeguarding policy. Similarly, any breach of privacy or confidentiality—particularly if it results in harm or damage is considered a serious violation of the policy and will require the organization to take appropriate corrective actions.

7.3. Types of Policy Breaches and Levels of Risk

Every safeguarding breach must be professionally and clearly assessed to determine its severity. The safeguarding focal point is responsible for determining the level of risk associated with each reported incident. The risk level is assessed based on two key factors:

1. Risk Level from the Organization's Perspective: This considers the organization's internal regulations, including all policies, procedures, and the Code of Conduct.
2. Risk Level for the Beneficiaries Affected: This is based on the extent of harm or danger experienced by the beneficiary due to the actions of an organizational member.

Risk levels are categorized as:

- Low Risk
- Medium Risk



- High Risk

The higher the risk level, the greater the organization's responsibility to take strict actions, which may include termination or supporting the survivor in pursuing justice (where possible). Conversely, when the risk level is low, the organization focuses on capacity building, awareness raising, and implementing preventive measures to avoid escalation to higher levels of harm.

مستوى خطر عالي	مستوى خطر متوسط	مستوى خطر منخفض
يعني خرق فاضح للسياسة ويشكل خطر كبير على المستفيدنات. في هذه الحالات، على المنظمة التصرف بشكل سريع وفعال لحماية الأفراد وتحمل المسؤولية. في معظم الحالات، هناك قرارات يجب ان تتخذ في هذا الشأن قد تصل الى فصل الفرد او وصولاً الى مساندة المستفيدنات في طلب العدالة.	يعني ان هناك خرق واضح للسياسة لكن ليس لمستوى كبير. ما يعني أن قد يسبب بعض الضرر لكن لا يخرق القوانين الأساسية. في هذه الحال، قد يكون هناك قرارات بحق الأفراد لكن لا تصل لحد الفصل من المنظمة.	يعني أي خرق للسياسة غير مسبب للأذى ويمكن معالجته من خلال زيادة الوعي والتدريب للفرد.

To better assess risks, we can refer to the table below. It demonstrates how the level of harm to beneficiaries and the degree of policy breach within the organization together form the two primary references for determining the severity of the impact of the reported behavior or incident.

Of course, there may be complex cases that are not as straightforward as the table suggests and may be difficult to categorize under a specific box. However, the key point here is that the investigation committee will have a reference framework or measurement tool that helps in evaluating cases objectively, without allowing any personal biases to influence the assessment.

It is essential to note that the higher both the level of harm to beneficiaries and the degree of policy breach, the greater the level of risk. Conversely, the lower these two factors are, the lower the risk level becomes.

مستوى الخطر على المستفيدنات				مس
3 – عالي	2 – متوسط	1 – منخفض	– منخفض	توى
			1 – منخفض	خر
			2 – متوسط	ق
			3 – عالي	السيا
				سات
				وقوا
				نن



7.4. Reporting Channels:

- Email
- WhatsApp message to a dedicated phone number
- Beneficiaries may also report through any member of the organization

7.5. Receiving the Report

- The safeguarding focal point receives the report.
- In cases where the focal point is excluded from the reporting process, the report must be submitted to the secondary safeguarding focal point.
- Ensure that the report is received through secure and designated channels.
- Read and understand the report carefully and make a preliminary assessment of the risk level.

7.6. Assessing the Report

- Evaluate the case and identify the parties involved.
- Define the scope and framework of the investigation.
- Determine if there are any missing details or information gaps.

7.7. Forming the Investigation Committee

- The committee could consist of three members: The safeguarding focal point and/or One board member and/or One staff member or volunteer.
- Members must not have any conflict of interest or power imbalance with the individual being reported.
- In cases where the safeguarding focal point is excluded from the investigation, the committee must consist of three other members who also meet the same eligibility criteria.

7.8. Understanding the Context and Incident

- The committee reviews the report to determine responsibilities and outline the steps required to ensure a transparent and serious investigation.
- Identify any missing information and decide how to gather additional details.
- Determine the individuals who need to be interviewed.
- Contact the person who submitted the report to collect further information if needed.
- Develop a work plan to guide the investigation process.

7.9. Interviews with Relevant Individuals

- Contact and interview the involved parties.
- Verify facts and cross-check information from multiple sources.
- Reach conclusions based on the collected evidence.



7.10. Report Writing

- Prepare a detailed incident report including findings and recommendations.
- Clearly outline the facts and explain how the recommendations were reached.
- Submit the report to the Executive Director (or Board of Directors).

7.11. Decision-Making

- After reviewing the report, the investigation committee meets with the Executive Director to jointly determine the appropriate decisions and actions regarding the report.

7.12. Closing the Investigation

- Finalize the investigation and securely store the report in a safe and confidential manner.

7.13. Follow-Up and Evaluation

- Conduct continuous evaluations to improve the safeguarding policy and the reporting and response mechanism.
- This process can involve all organization members in general and, in particular, those who submitted reports or were reported against.
- Include the feedback and evaluations of beneficiaries as part of this assessment.

7.14. Seeking Justice

- SEEN for Gender and Sexual Equity acknowledges the arbitrary nature of carceral justice systems and their legal and security procedures in general, and particularly within Syrian territories, as well as their intersections with prevailing forms of social discrimination. The organization strives to empower affected individuals and support them, whenever they choose to seek justice, by providing alternative, non-violent, community-based mechanisms. Given the inability to pursue litigation before courts or file complaints with relevant authorities across Syrian territories, regardless of the political power controlling them, and due to the sensitive situation of the LGBTQIA+ community in Syria—being the core constituency of the organization and the focus of its activities—when a breach of the Code of Conduct or any incident of violation occurs against a community member within Syrian territories, the organization refers to the provisions of its internal regulations and related safeguarding policies. However, if the violation occurs outside Syrian territories, or if affected individuals decide to seek justice through a safer judicial system where possible, SEEN commits to standing by them and providing necessary support should they wish to pursue this path.

8. Capacity Building and Training

As mentioned earlier, SEEN works diligently on building the capacities of its staff and volunteers as part of its commitment to promoting a culture of prevention, identifying levels of risk, and reducing the likelihood of harmful behaviors toward beneficiaries.



Capacity building includes the following activities:

- 8.1. Induction:** SEEN ensures a comprehensive induction process for new staff and volunteers in the organization. This includes an introductory meeting where individuals are introduced to the organization's internal policies and procedures, including safeguarding, protection from sexual harassment, and the Code of Conduct. The safeguarding focal point and the HR officer facilitate the induction process, but it may also involve the active participation of the Board of Directors or managers (e.g., project managers, department heads, etc.).
- 8.2. Training:** SEEN conducts regular trainings for its staff and volunteers on all internal policies and procedures. Additionally, SEEN works to build individual skills and capacities necessary for effectively implementing their roles. The aim of training is to develop a strong, competent team capable of working efficiently and responsibly in the best interest of the beneficiaries. Training covers policies and procedures but also focuses on essential job-related skills needed to perform tasks effectively.
- 8.3. Case Studies:** Using case studies is a valuable learning method as it allows participants to analyze real or realistic scenarios that may occur in the field. Through this process, individuals: Examine incidents from multiple perspectives, Discuss their viewpoints and share insights with others, Agree collectively on the most effective way to handle similar cases. This is considered a "learning by doing" approach and can be used both within formal trainings and during shorter, focused meetings when needed.
- 8.4. Experience Sharing:** Sharing knowledge and experiences is an effective way to enhance collective learning. This can occur: Formally, during organized trainings or structured sessions, Informally, during meetings or group discussions. Experience sharing allows individuals to learn from one another by teaching and being taught, making capacity building inclusive and rooted in the diverse expertise of organizational members.

9. Review and Evaluation

- First Year: Quarterly reviews to evaluate effectiveness and identify challenges.
- Subsequent Years: Biennial reviews or as needed.
- Responsible Parties: Safeguarding focal point, M&E lead, Executive Director, and Board.
- Amendments require Board approval and subsequent organization-wide training.

10. Policy Dissemination

The safeguarding policy must be disseminated internally within the organization to reach all members and externally to beneficiaries and the communities that the organization has worked with, is currently working with, or may work with in the future.

Therefore, it is important to distinguish between two types of dissemination: internal (within the organization) and external (to beneficiaries and communities).

Internal Dissemination



- Targets all individuals within the organization (staff, volunteers, board members, etc.).
- The Board of Directors and the HR department are responsible for sharing the policy with everyone and regularly reminding them of its contents.
- The Safeguarding Focal Point conducts capacity-building activities and awareness sessions on the policy, its importance, and its implementation.
- All members of the organization must sign the policy after attending the safeguarding training.
- All members must sign the updated version whenever policy amendments are issued and after attending a dedicated session or training explaining the updates.

External Dissemination

- Targets the communities the organization works with, particularly beneficiaries.
- Organizational members who work directly with beneficiaries are responsible for explaining the policy.
- The goal is not only to inform beneficiaries about the policy but also to reassure them that the organization is committed to safeguarding principles, informed consent, and safe reporting and response mechanisms.
- This information should be communicated verbally, in writing, or through any appropriate and accessible means.
- The Board of Directors, the Safeguarding Focal Point, and managers/decision-makers are responsible for supporting staff to ensure the effective implementation of external dissemination and for monitoring its success.
- The organization may also prepare a dedicated, concise leaflet or post summarizing the safeguarding policy, the organization's commitments, the reporting procedures, and the available communication channels.
- This material can be shared on social media platforms or distributed directly via WhatsApp to the relevant individuals and communities.

SUPPORTING DOCUMENTATION

Safeguarding Reporting Template (Appendix 1)
Investigation Report Template (Appendix 2)

RELATED POLICIES

Policy on Protection from Sexual Exploitation, Abuse, and Harassment (PSEAH)
Confidentiality and Privacy Policy
Code of Conduct

RELATED MATERIALS

SGSE Mission Statement.
SGSE Vision.



Appendix 1: Safeguarding Reporting Template

Report Date:

Reporter's Name:

Role/Title:

Contact Information:

1. Incident Details

- Date:
- Time:
- Location:
- Names/Roles of involved individuals:

2. Type of Violation

[] Physical Abuse
[] Emotional Abuse
[] Neglect
[] Sexual Abuse
[] Exploitation
[] Other (specify):

3. Incident Description / Concerns

4. Immediate Actions Taken (if any)

5. Witnesses (if any): Name / Contact Info

6. Evidence/Documents (if any)

I confirm that the information provided is accurate and complete to the best of my knowledge.

Signature: _____ **Date:** _____

Submission: Safeguarding email / official WhatsApp.

Appendix 2: Investigation Report Template

Investigation Date:

Lead Investigator & Committee Members:

Role/Title:

1. Incident Details (Date, Time, Location, Parties Involved)

2. Type of Violation

[] Physical Abuse
[] Emotional Abuse
[] Neglect
[] Sexual Abuse
[] Exploitation
[] Other (specify):

3. Background Information (context, relationships, prior concerns)

4. Incident Description

5. Witnesses (names and contacts)

6. Evidence Collection (methodology and findings)

7. Interviews (summaries)



8. **Findings** (verified facts)
9. **Conclusion** (analysis and evaluation)
10. **Recommendations** (proposed actions)

Signatures of Investigation Committee Members: _____
Date: _____