

# Safeguarding Policy



Defined terms are capitalized, and definitions for defined terms are provided in Section 6, Definitions.

## 1. Purpose

- 1.1. Innovations for Poverty Action (IPA) employees and Representatives, especially those engaged in the implementation of field activities, may come into contact with Children and Vulnerable Adults that are especially susceptible to harm. It is IPA's responsibility to ensure IPA employees and Representatives do not put people, including Children and Vulnerable Adults, in a position of potential harm and/or cause them harm. It is imperative therefore that all IPA employees and Representatives understand what they can do to safeguard the people they work with on behalf of IPA, prevent and report Abuse, and recognize every individual's need for safeguarding and protection.
- 1.2. The purpose of this policy is to define IPA's approach to safeguarding, to articulate IPA's safeguarding requirements, and to document IPA's protocol for reporting safeguarding abuses. IPA's Code of Conduct, Anti-harassment policies, and Whistleblower Policy complement this policy and describe additional requirements for IPA staff. Harassment or Abuse against an IPA employee is covered by IPA's Anti-Harassment Policy.

## 2. Applicability

- 2.1. This policy applies to all IPA employees and Representatives and others who work on IPA's behalf with or around Children and/or Vulnerable Adults, visit IPA projects, or who have access to sensitive information about Children and/or Vulnerable Adults participating in IPA's projects.
- 2.2. Per this policy, any individual under the age of 18 is a Child and is considered "underage," regardless of the legal age of consent of the country in which s/he lives and/or in which the offense occurs. Consult the Guidance section of this policy below for additional definitions.

## 3. Roles & Responsibilities

- 3.1. All IPA employees and Representatives are responsible for understanding and complying with the requirements of this policy, expected to understand what constitutes Abuse, and for the reporting requirements associated with such Abuse. IPA employees and Representatives are required to report all suspected cases of Abuse and violations of this policy in accordance with the reporting requirements detailed in the Reporting Abuse Section below.
- 3.2. Country Directors/Representatives are responsible for ensuring their staff, consultants, volunteers and interns receive a copy of and are trained on this policy according to the globally administered requirements.
- 3.3. The Chief People Officer (CPO) is responsible for maintaining this policy and updating it as necessary. The CPO is also responsible for ensuring that IPA Global staff, consultants, interns and volunteers are trained on this policy and for holding Country Directors accountable for the compliance of Country Office staff.

- 3.4. The General Counsel is responsible for ensuring that reported cases of Abuse and other policy violations are investigated.

## 4. Policies

- 4.1. IPA is committed to conducting its research and operations in a manner that is safe for all people, especially those that are most susceptible to Abuse, including Children and Vulnerable Adults.
- 4.2. It is IPA policy to ensure compliance with host country and local child welfare and protection legislation, U.S. law, where applicable, and U.S. Government and host country requirements for research involving human subjects, including, requiring human subjects training for research personnel and Institutional Review Board (IRB) review of research activities.
- 4.3. All IPA employees and Representatives are expected to conduct themselves in a manner consistent with the commitment and obligation of conducting its research and operations in a manner that is safe for all people.
- 4.4. To safeguard all people, IPA employees and Representatives must not:
  - Engage in Abuse or any activity that may result in any kind of Abuse;
  - Use language or act in a way that is physically or sexually provocative and inappropriate around Children or Vulnerable Adults;
  - Place themselves in compromising or vulnerable positions with Children or Vulnerable Adults;
  - Shame, humiliate, belittle or degrade Children or Vulnerable Adults;
  - Engage in or knowingly support any Sexual Exploitation or Exploitation including, without limitation, trafficking and child labor;
  - Exchange money, employment, goods or services for sexual activity;
  - Engage in sexual relationships with beneficiaries or participants.
- 4.5. IPA employees and Representatives must not directly or indirectly undertake any activity with any participant, including but not limited to conversations, interviews, photos or video, audio taping or requesting any action of the participant, without receiving their consent and without ensuring that their safety and well-being will not be put at risk due to the activity during and after the activity.
- 4.6. IPA has zero tolerance for violations of this policy. All violations of this policy will be treated as a serious matter and will result in disciplinary action being taken, up to and including employment termination for employees and any and all other available legal remedies for employees and Representatives.

## 5. Policy Implementation

### Recruitment & Training

- 5.1. IPA will not knowingly hire anyone it learns has a Child or Vulnerable Adult maltreatment conviction and reserves the right to terminate the employment of anyone found retrospectively to have a historical conviction. Additionally, allegations of IPA employees involved in Child or Vulnerable Adult Abuse during their employment with IPA will be reported and investigated, as permissible by local laws, and appropriate disciplinary action may be taken, up to and including termination.

- 5.2. During the interview phase of the recruitment process, applicants for positions involving interactions with Children and/or Vulnerable Adults may be asked about previous work with these populations. Where possible and permissible by local law, applicants may be requested to give written permission for a criminal or police background check for any convictions related to the maltreatment of Children and Vulnerable adults. If such checks are instituted, candidates are informed that hiring will be contingent on a record check.
- 5.3. All IPA employees shall receive training on this Safeguarding Policy within the first 30 days of employment as part of their onboarding program. If the employee's role involves engagement with research subjects the training must be completed prior to such engagement.

## Preventing Abuse of Children and Vulnerable Adults

- 5.4. Employees and Representatives must obtain assent (agreement) from Children and Vulnerable Adults and permission from his or her parent or guardian who is over the age of 18 for all interviews, videotaping, and documentary photographs. When possible and appropriate, and where required by applicable law or IRB requirements, the assent/permission should be in writing.
- 5.5. Assent and permission must be obtained in circumstances that ensure the Child/Vulnerable Adult and guardian are not coerced in any way and understand that they are part of a story that might be disseminated locally and globally. This is usually ensured only if the assent/permission is obtained in the child/adult's language.
- 5.6. Where possible and practical, the "two-adult" rule, wherein two or more adults supervise all activities where Children or Vulnerable Adults are involved and are present at all times, should be followed. Where the "two-adult" rule is not possible, plan or organize the work or workspace involving children to minimize risks, including for example interacting with children in a location that is visible to others.

## Reporting Abuse

- 5.7. IPA employees and Representatives must report:
  - any actual, suspected or alleged Abuse or exploitation of any kind involving participants in IPA activities, based upon reporting requirements of local laws,
  - any disclosure, concern, or allegation from a participant of Abuse, based upon reporting requirements of local laws,
  - suspicions of violations of this policy.
- 5.8. Employees and Representatives must report all suspicions, allegations of Abuse, and violations of this policy as soon as possible, ideally within 24 hours, to anyone in management who the employee or Representative feels comfortable approaching.
- 5.9. All managers **MUST** report all allegations, suspicions, and violations immediately to the General Counsel/Chief Compliance Officer, who has the exclusive responsibility to ensure that all substantiated reports are investigated.
- 5.10. Abuse and violations or suspected violations of this policy may be submitted on a confidential basis. Reports of violations or suspected violations will be kept confidential to the extent possible, although limited disclosure may be necessary in some cases to conduct an investigation or where compelled by law. If any employee or Representative does not feel

comfortable reporting Abuse or policy violations to a manager or directly to the General Counsel/Chief Compliance Officer, a complaint may be anonymously submitted through IPA's whistleblower hotline (+1 844-837-5445 or [www.lighthouse-services.com/poverty-action](http://www.lighthouse-services.com/poverty-action)).

- 5.11. Anyone filing a report of any Abuse or allegation of violation of this Safeguarding Policy must act in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the policy or Abuse.
- 5.12. Any employee or Representative who in good faith who reports a violation of this policy or Abuse shall not suffer harassment, retaliation or adverse employment consequences (in the case of an employee) as a result of that report. Any employee who retaliates against someone who has reported a violation or Abuse in good faith is subject to disciplinary action up to and including termination of employment.

## Investigating Abuse

- 5.13. IPA takes every allegation of a violation of this Safeguarding Policy seriously. IPA Employees and Representatives must cooperate fully with any investigation or inquiry by IPA and preserve all records relating to any alleged violation of this policy.
- 5.14. Upon receipt of a reported violation of this policy by an IPA employee or Representative, an investigation will be conducted by the General Counsel or his/her designee.
- 5.15. An alleged violator of this policy may be suspended from their position (without pay if allowed under applicable law) during an investigation of the allegation. A staff member who is proven to have violated this policy or committed Abuse may be dismissed from their employment with IPA and be ineligible for rehire. Any alleged violator who it is proven did not violate this policy or commit Abuse, will be reinstated to their position with repayment of all salary withheld during the suspension.
- 5.16. In the event the allegation is proven to be untrue or fabricated, appropriate steps will be taken for follow-up with the person who has been accused, the victim, and the person who made the accusation. Any IPA staff member who makes false and malicious accusations will face disciplinary action, up to and including termination.

## 6. Definitions

### 6.1. Definitions and acronyms:

- **Abuse:** knowingly engaging in an any action or inaction that has the potential to harm another person, including the following:
  - **Physical Abuse:** the use of physical force that causes actual or likely physical injury or suffering (e.g., hitting, shaking, burning, female genital mutilation, torture).
  - **Emotional Abuse:** any humiliating or degrading treating such as name-calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation.
  - **Sexual Abuse:** all forms of sexual violence, including incest, early and forced marriage, rape, sex without valid consent, involvement in pornography, and sexual slavery. Child sexual abuse also may include indecent touching or exposure, using sexually explicit languages towards a child and showing children pornographic material.

- **Exploitation:** the actual or attempted misuse of a position of vulnerability, power differential, or trust for the benefit of the individual leveraging their position, power, privilege, or wealth (through enticement, manipulation, coercion or trickery). Exploitation may take many forms including forced labor and forced criminality.
- **Sexual Exploitation:** any actual or attempted misuse 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. This includes exchange of assistance due to beneficiaries or participants in IPA projects. The sexual exploitation of a child who is under the age of consent is child sexual abuse and a criminal offense.
- **Neglect:** a deficit in meeting the basic needs of a Child or Vulnerable Adult when a parent or guardian is capable of meeting those needs, including the failure to provide adequate supervision, health care, clothing, or housing, as well as other physical, emotional, social, educational, and safety needs.
- **Child or Children:** anyone under 18 years of age.
- **Representatives:** volunteers, interns, consultants, members of the Board of Directors, vendors and subrecipients, partners, Principal Investigators and others who work with Children or Vulnerable Adults on IPA's behalf, visit IPA projects, or who have access to sensitive information about Children or Vulnerable Adults in IPA's projects.
- **Safeguarding:** measures taken to protect the health, wellbeing and human rights of all people, enabling them to live safely and free from Abuse and Neglect.
- **Vulnerable Adult:** a person who is 18 years of age or over and 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/herself, or unable to protect him/herself against significant harm or serious exploitation.