

BOARD APPROVAL PAGE

(To be attached at the front of the Safeguarding Policy)

Organisation: SpringAid International Development Nigeria

Policy Title: Safeguarding Policy (Including Prevention of Sexual Exploitation, Abuse and Harassment – PSEAH)

Effective Date: December 2024

Review Cycle: Every 3 years or as required by donor regulations

The Board of Directors of SpringAid International Development Nigeria hereby approves this Safeguarding Policy and its annexes. The Board affirms its commitment to **zero tolerance** for sexual exploitation, abuse, harassment, child abuse, corruption, and all forms of misconduct.

The Board further commits to:

- Providing leadership and oversight on safeguarding
- Ensuring adequate systems, reporting mechanisms, and resources
- Upholding donor (including Sida) compliance standards
- Taking timely and appropriate action on safeguarding concerns

Approved by the Board on: 14th December 2024

Name	Position	Signature	Date
Freddie Iheanaetu	Board Chair	_____	_____



SAFEGUARDING POLICY

(Children, Young People & Vulnerable Adults)

Approved by: Board of Directors

Effective Date: December 2024

Review Cycle: Every three (3) years or as required by donor or legal updates

Applies to: All staff, board members, volunteers, consultants, partners, contractors, and associates

1. Policy Statement

SpringAid International Development Nigeria ("SpringAid Nigeria") is fully committed to preventing and responding to all forms of abuse, neglect, exploitation, and harassment affecting children, young people, and vulnerable adults. Safeguarding is a core organisational responsibility and a fundamental condition for engagement with SpringAid Nigeria.

SpringAid Nigeria operates a **zero-tolerance policy** toward:

- Sexual Exploitation, Abuse, and Harassment (SEAH)
- Physical, emotional, or psychological abuse
- Neglect or negligent treatment
- Human trafficking, forced labour, or exploitation of any form

This policy aligns with **Sida safeguarding requirements**, the UN Convention on the Rights of the Child (UNCRC), the Core Humanitarian Standard (CHS), and Keeping Children Safe (KCS) standards.

2. Scope of Application

This policy applies to all individuals acting on behalf of SpringAid Nigeria, including during:

This policy applies to:

- All SpringAid Nigeria staff (national and international)
- Board members
- Volunteers and interns
- Consultants and researchers
- Contractors and service providers
- Partner organisations and sub-grantees
- Any individual acting on behalf of SpringAid Nigeria

The policy applies **during office hours, fieldwork, travel, events, online activities, and informal interactions** linked to SpringAid Nigeria's work.

3. Definitions

3.1 Child

A **child** is any person under the age of 18 years, in line with the UN Convention on the Rights of the Child (UNCRC).

3.2 Vulnerable Adult

A **vulnerable adult** is a person aged 18 or over who, due to gender, disability, age, illness, displacement, poverty, or social exclusion, may be at increased risk of abuse or exploitation.

3.3 Safeguarding

Safeguarding means **preventing harm, responding appropriately to concerns, and promoting wellbeing.**

3.4 Sexual Exploitation, Abuse and Harassment (SEAH)

- **Sexual Exploitation:** Abuse of a position of power or trust for sexual purposes.
- **Sexual Abuse:** Actual or threatened physical intrusion of a sexual nature.
- **Sexual Harassment:** Unwelcome sexual conduct, verbal or non-verbal.

4. Guiding Principles

1. Do No Harm
2. Best Interests of the Child
3. Survivor-centred approach
4. Zero tolerance for abuse
5. Confidentiality and data protection
6. Accountability and transparency
7. Participation and inclusion
8. Non-discrimination

5. Roles and Responsibilities

5.1 Board of Directors

The Board has **ultimate accountability** for safeguarding and shall:

- Approve and oversee this policy
- Ensure adequate resources for safeguarding
- Review safeguarding reports and serious incidents

5.2 Executive Director

The Executive Director is responsible for:

- Overall implementation
- Donor notification (including Sida)

- Ensuring disciplinary action

5.3 Safeguarding Focal Point

SpringAid Nigeria shall appoint a **Safeguarding Focal Point**, responsible for:

- Receiving and documenting safeguarding concerns
- Coordinating response and referrals
- Advising staff and partners
- Maintaining safeguarding records
- Ensuring alignment with international best practice

5.4 All Staff and Associates

All personnel must:

- Uphold this policy
- Report concerns immediately
- Participate in safeguarding training

6. Safer Recruitment

SpringAid Nigeria commits to **safe recruitment**, including:

- Clear safeguarding statements in job adverts
- Behaviour-based interview questions
- Reference checks with safeguarding questions
- Self-disclosure declarations
- Mandatory signing of:
 - Safeguarding Policy
 - Code of Conduct
 - Anti-Corruption Policy

Safeguarding clauses are included in:

- Employment contracts
- Consultancy agreements
- Partner MOUs

7. Code of Conduct (Summary)

All covered persons must:

- Treat children and vulnerable adults with respect and dignity
- Avoid being alone with a child where possible
- Never engage in sexual activity with beneficiaries
- Never exchange money, gifts, or favours for sex
- Avoid inappropriate physical contact

- Use appropriate language and behaviour
- Respect confidentiality and consent

Breaches are grounds for disciplinary action, including dismissal and referral to authorities.

8. Reporting Safeguarding Concerns

8.1 Duty to Report

All safeguarding concerns must be reported **immediately**, and no later than **24 hours**.

8.2 Reporting Channels

Reports may be made to:

- Safeguarding Focal Point
- Executive Director
- Board Chair (if senior management is implicated)

Reports can be made:

- In writing
- Verbally
- Confidentially
- Without fear of retaliation

8.3 Whistleblower Protection

SpringAid Nigeria protects whistleblowers from retaliation. Confidentiality is strictly maintained and retaliation is prohibited.

9. Response and Investigation

- Survivor safety is the first priority
- Referrals made where required by law
- Donors notified in line with agreements
- Fair and confidential investigations conducted

10. Partner and Contractor Compliance

All partners and contractors must:

- Maintain equivalent safeguarding standards
- Report incidents immediately
- Accept audits and sanctions

11. Training and Awareness

- Mandatory induction training
- Regular refresher sessions
- Documented participation

12. Communications and Media

- Informed consent required
- Dignified and ethical representation
- Secure storage of images and data

13. Data Protection

Safeguarding data is stored securely and accessed only by authorised persons, in line with Nigerian law and donor requirements.

14. Non-Compliance

Breaches may result in:

- Suspension
- Disciplinary action
- Termination of contract
- Referral to law enforcement
- Donor notification

15. Review and Updates

This policy shall be:

- Reviewed every **three (3) years**
- Updated as required by:
 - Donor requirements
 - Legal changes
 - Organisational learning

Annexes (to be attached separately)

- Annex A: Safeguarding Code of Conduct
- Annex B: Safeguarding Incident Reporting Form
- Annex C: Staff Acknowledgement & Declaration
- Annex D: Partner Safeguarding Commitment



ANNEX A: SAFEGUARDING CODE OF CONDUCT

Purpose

This Code of Conduct defines mandatory standards of behaviour for all staff, board members, volunteers, consultants, interns, and partners of SpringAid Nigeria.

Mandatory Commitments

All covered persons must:

1. Treat all children, women, men, and community members with dignity and respect
2. Uphold a **zero-tolerance approach** to:
 - Sexual exploitation and abuse (SEA)
 - Sexual harassment (SH)
 - Child abuse or neglect
 - Abuse of power or authority
3. Never engage in sexual activity with:
 - Children (under 18), regardless of local laws
 - Project beneficiaries in exchange for money, goods, services, or favours
4. Never use organisational position for personal gain
5. Maintain professional boundaries at all times
6. Obtain informed consent for all data collection and photography
7. Report any safeguarding concern immediately, whether witnessed or suspected

Prohibited Behaviour (Non-Exhaustive)

- Sexual relationships with beneficiaries
- Inappropriate physical contact
- Exploitative language or gestures
- Intimidation, threats, or coercion
- Retaliation against whistleblowers

Breach of this Code constitutes grounds for disciplinary action, including termination and referral to authorities.

ANNEX B: SAFEGUARDING INCIDENT REPORTING FORM

CONFIDENTIAL – SAFEGUARDING REPORT

Section 1: Reporter Information

(You may report anonymously)

- Name (optional): _____
- Role: Staff Consultant Volunteer Partner Community Member
- Contact (optional): _____

Section 2: Incident Details

- Date of incident: _____
- Location: _____
- Type of concern (tick all that apply):
 - Sexual exploitation
 - Sexual abuse
 - Sexual harassment
 - Child safeguarding
 - Abuse of power
 - Other (specify): _____

Section 3: Description of Incident

(Provide factual information only)

Section 4: Persons Involved

- Alleged survivor(s): _____
- Alleged perpetrator(s): _____

Section 5: Immediate Risk

Is anyone currently at risk? Yes No

If yes, explain: _____

Section 6: Consent

Has the survivor consented to this report? Yes No Not applicable

Submit to:

Safeguarding Focal Person / Executive Director

Email: safeguarding@springaidnig.org (or official address)

ANNEX C: STAFF ACKNOWLEDGEMENT & DECLARATION

I, the undersigned, confirm that:

1. I have received, read, and understood SpringAid Nigeria's Safeguarding Policy and Code of Conduct
2. I commit to comply fully with all safeguarding requirements
3. I understand my duty to report safeguarding concerns
4. I understand that violations may lead to disciplinary action, termination, or legal proceedings

Declaration

I declare that I have never been convicted of, nor am I under investigation for, any offence related to sexual exploitation, abuse, harassment, child abuse, or serious misconduct.

Name

Position

Signature

Date



ANNEX D: PARTNER SAFEGUARDING COMMITMENT

Partner Organisation Declaration

SpringAid Nigeria requires all implementing partners, contractors, and sub-grantees to commit to safeguarding standards equivalent to this policy.

By signing below, the partner organisation confirms that it:

1. Has a safeguarding policy or agrees to apply SpringAid Nigeria's policy
2. Maintains zero tolerance for SEA, SH, and child abuse
3. Will report safeguarding incidents within **24 hours**
4. Will cooperate fully with investigations
5. Will ensure safeguarding awareness among its staff

Partner Organisation: _____

Authorized Representative: _____

Title: _____

Signature: _____ **Date:** _____