



Programme Participant Safeguarding Policy

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| Title | Programme Participant Safeguarding Policy |
| Objective | Promotion of the welfare of programme participants and children and protect them from any harm due to HPA's operations and actions. |
| Issued By | Chief Executive Officer |
| Endorsed by | Board of Directors |
| Applicable to | Executive staff, employees, interns and volunteers, contractors, consultants and other third parties carrying out activities on behalf of HPA |
| Contact | HQ Safeguarding Officer – Sandra Tcheumeni Boschet s.tcheumeni@healthpovertyaction.org Board Safeguarding Lead – Anna Graham Contact via general@healthpovertyaction.org |
| Last updated | April 2026 |
| Date of Approval | 9 th April 2026 |
| To be Reviewed | April 2027 |
| Useful Policies to read in addition | Code of Conduct HPA PSEA Handling Framework HPA Whistleblowing Policy |

1. Scope & Purpose

Violence against any beneficiary or program violates both the values and purpose of HPA's work and directly opposes our aims. We must ensure that children and program participants never experience harm, abuse, exploitation, or any other

forms of violence through their engagement with our programs, projects, events, and processes.

Health Poverty Action acknowledges that our relief and development programs create a power imbalance between our Employees and Related Personnel and program participants. This imbalance could be exploited for bribes, payments, gifts, services, or sexual favours. Our Health Poverty Programme Participants Safeguarding Policy protects participants from exploitation while establishing clear responsibilities and behavioural standards for our staff, volunteers, interns, and visitors. "Participants" includes our project beneficiaries, community members in our work areas, and Health Poverty Action Employees and Related Personnel.

This policy outlines our approach to preventing and addressing power abuse and exploitation. Through it, we maintain accountability to our program participants and children. The policy aims to ensure that:

- All who work for and engage with us are skilled, confident, and well-supported in safeguarding children and program participants from violence while fostering positive interactions that advance our purpose.
- We maintain clear procedures to prevent and address any actions by our staff, associates, visitors, or organisation that might harm or endanger a child or program participant.
- Children and program participants understand our responsibilities to prevent and respond to potential harm from our staff, associates, and visitors and know how to report incidents.

This policy applies worldwide to all Health Poverty Action employees, partners, visitors, volunteers, and third parties wherever HPA operates. It covers all activities throughout the project cycle and protects all program participants regardless of age, race, ethnicity, or other factors. The policy also safeguards all children and individuals under 18, whether or not they are directly associated with Health Poverty Action.

2. Policy Statement

Health Poverty Action recognises that all adults and children have equal rights to protection from abuse and exploitation. Every program participant has the fundamental right to freedom from exploitation—the same right granted to all human beings. These rights are enshrined in the Universal Declaration of Human Rights, the UN Convention on the Rights of the Child (UNCRC), the UN Convention for the Elimination of all Forms of Discrimination against Women (CEDAW), and the national laws of most countries where we work.

Health Poverty Action recognises that certain groups are particularly vulnerable to abuse, harassment, sexual violence, rape, bullying, discrimination, and extortion—especially children, women, and people with mental illness or physical disabilities.

Health Poverty Action has a zero-tolerance policy toward exploitation and inappropriate behaviour, and is committed to protecting program participants through this policy. At Health Poverty Action, we believe all people have the right to live free from sexual violence and abuse of power, regardless of age, gender, sexuality, sexual orientation, disability, religion, or ethnic origin. While this policy primarily aims to protect community-based participants and beneficiaries, it also safeguards our staff, organisation, and partners. The policy applies to all Health Poverty Action Employees and related personnel. Partners working with us must also comply with the Programme Participant Safeguarding Policy.

We strive to create a culture of awareness where all staff understand the problems of abuse, inequity, exclusion, and discrimination. We recognise how the misuse of power and privilege affects organisational safety and emphasize everyone's responsibility to ensure a safe, respectful, and inclusive environment for the children and program participants we serve. We also ensure that everyone associated with the organisation understands their duty to prevent harm and protect our participants.

We commit to responding to any program participant or child report of misconduct according to our guidelines.

3. Guiding Principles

Health Poverty Action is committed to responding in a professional and timely manner to all concerns or allegations of exploitation. All concerns and allegations will always be taken seriously, investigated, and acted upon where appropriate, in line with our safeguarding principles listed below.

- **Robust and accountable case management**

All allegations of exploitation and subsequent follow-up will be documented in a secure and confidential database to ensure accountability. The report will be officially acknowledged within 24 hours, and a safeguarding team will convene a case conference to assess immediate risks and next steps within 72 hours.

- **Safe & Independent Investigations**

Health Poverty Action will carry out independent, safe, and discreet investigations through trained investigators working with Health Poverty

Action's Safeguarding Teams. These investigations will recognise the rights and duty of care to everyone involved, including the complainant and/or survivor, witnesses, and the subject of the complaint.

- **Accountable decision-making**

Health Poverty Action will take swift and appropriate action against employees and related personnel who breach the PPSP. This may include administrative or disciplinary action and/or referral to relevant local authorities when appropriate and safe. An independent, gender-representative decision-making panel will be assigned to each investigation to ensure impartiality, transparency, and accountability (for example, country cases may include panel members from outside the country). The decision-making process will be subject to scrutiny by relevant safeguarding leads and/or advisors.

- **Survivor-centred approach**

Survivors of SHEA are entitled to specialized support services. Health Poverty Action commits to referring survivors to competent support services as appropriate and available, according to their wants and needs. Support may include specialist psychosocial counselling, medical assistance, legal counselling, and access to Health Poverty Action Employee Assistance Programmes (where available). Assistance will be made available regardless of whether a formal internal response is carried out (such as an internal investigation).

- **Equity and inclusion**

HPA ensures that all program participant policies and procedures consider gender equality and non-discrimination requirements. We recognise that children and young people of all genders may face different safety and safeguarding risks. All children and young people have an equal right to protection, regardless of age, sex, gender, gender identity, sexual orientation, nationality, ethnic origin, colour, race, language, religious or political beliefs, marital status, disability, physical or mental health, family, socioeconomic or cultural background, or class.

4. Health Poverty Action PSEA Principles and Commitments

Against Exploitation

Health Poverty Action is committed to fully implementing the Six Core Principles on Sexual Exploitation and Abuse established by the Inter-Agency Standing

Committee (IASC) Working Group on Prevention and Response to Sexual Exploitation and Abuse.

4.1. Health Poverty Action's Core Principles on PSEA

- Sexual exploitation and abuse by Health Poverty Action employees and related personnel constitute acts of gross misconduct and are grounds for termination of employment or contract/agreement. Sexual harassment by Health Poverty Action employees and related personnel is grounds for disciplinary action, up to and including dismissal.
- Sexual activity with children (persons under the age of 18) is prohibited regardless of the local age of majority or consent. A mistaken belief regarding a child's age is not a defence. Health Poverty Action extends this prohibition to cases where the local age of consent is higher than 18.
- Exchange of money, employment, goods, or services for sex—including sexual favours or other forms of humiliating, degrading, or exploitative behaviour—by Health Poverty Action employees and related personnel is always prohibited. This includes buying sex or exchanging assistance that is due to program participants.
- Sexual relationships between Health Poverty Action employees or related personnel and beneficiaries must be declared. In our operating contexts, such relationships may be based on inherently unequal power dynamics and can undermine the credibility and integrity of Health Poverty Action's relief and development work. Health Poverty Action Employees and Related Personnel must declare any pre-existing relationships with beneficiaries to their line managers or HR focal point.
- When a Health Poverty Action employee or related personnel develops concerns or suspicions about sexual abuse, exploitation, or harassment by a fellow worker—whether within Health Poverty Action or not—they must immediately report these concerns through established reporting mechanisms (see Section 5).
- Health Poverty Action Employees and Related Personnel must create and maintain an environment that prevents sexual exploitation, abuse, and child abuse while promoting the implementation of this policy. Health Poverty Action managers at all levels have specific responsibilities to support and develop systems that maintain this environment.

4.2. Health Poverty Action Child Safeguarding Commitments

Health Poverty Action recognises the specific risks posed to children. The principles and guidance outlined in the PPSP apply to all people with whom Health Poverty Action interacts. The organisation maintains a zero-tolerance approach to child abuse and exploitation. Health Poverty Action implements specific additional safeguarding procedures to address the unique risks children face and to meet their distinct needs.

5. Health Poverty Action Approach to Safe Programming

Health Poverty Action is committed to preventing and responding to sexual exploitation, abuse, and harassment, as outlined in the Six Core Principles above, while also preventing exploitation arising from power abuses.

5.1. Awareness

Health Poverty Action will create and maintain an environment where all staff, representatives, and third parties connected to HPA understand the high standards of behaviour and conduct expected of them. These standards protect program participants and children from abuse, exploitation, and discrimination in both private and working lives. Our awareness strategies include:

- **Staff and partner training:** Every Health Poverty Action office will display the PPSP Code of Conduct. All employees and related personnel must sign the PPSP and receive contact details for reporting. They must also receive an induction briefing covering Health Poverty Action's values, Code of Conduct, reporting procedures, and guidance on safeguarding practices across the organisation. Personnel working directly with beneficiaries must complete additional training on receiving and handling complaints safely and confidentially.
- **Beneficiary Engagement:** Health Poverty Action commits to engaging our programme participants and their communities by: (i) maintaining transparency about our programming, activities, and services that beneficiaries are entitled to; (ii) raising awareness about our Code of Conduct, safeguarding policies, and reporting channels.

5.2. Prevention

Health Poverty Action implements various practices to ensure prevention across all staff and associates.

- **Safer Recruitment:** Health Poverty Action is committed to preventing perpetrators of exploitation from being (re)hired or (re)deployed. Managers and Human resources teams implement robust recruitment screening

processes for all personnel, including employees, volunteers, consultants, and other representatives. All application forms, interviews, and references must address safeguarding and equality requirements and attitudes.

- Partnership Agreements: When engaging in partnerships, sub-grant, or sub-recipient agreements, Health Poverty Action ensures these agreements: (i) incorporate this policy as an attachment; (ii) include appropriate language requiring contracting entities, individuals, and their employees and volunteers to follow a Code of Conduct aligned with this policy's standards; and (iii) clearly state that failure to prevent exploitation, investigate and report allegations, or take corrective actions when exploitation occurs will constitute grounds for agreement termination.
- Beneficiary involvement: HPA commits to actively seeking feedback from communities about our work, individual behaviours, and complaints and communicating to communities what changes have been made based on their feedback. These engagement activities occur regularly throughout the program or activity lifecycle.

5.3. Reporting

Health Poverty Action Employees and Related Personnel have a responsibility to report any suspicion or concern of exploitation. Any individual can report a concern or complaint to Health Poverty Action about an incident they have experienced, witnessed, or heard about concerning a Health Poverty Action staff member or partner (suppliers, partners, contractors, etc.) without fear of retribution. HPA ensures that all staff and those engaged with HPA's work understand the specific steps to take when concerns arise about program participant or child safety.

- Reporting Channels: Anyone (including Health Poverty Action's beneficiaries) can raise a concern or make a complaint about something they have experienced or witnessed without fear of retribution. Reports can be made verbally or in writing to your line manager, country director, or directly to the local, national, regional or global safeguarding focal points. Employees may also raise concerns with their Line Manager or Human Resources team member. Detailed reporting procedures are found in Annex 2.
- Confidentiality: We maintain strict confidentiality throughout the complaints process. Information identifying individuals involved in a complaint is limited to essential personnel and will not be shared without obtaining informed consent from those involved. Exceptions apply if someone's life is at risk, a child is at risk, or as required by law—in consultation with legal counsel and

where safe to do so. Non-identifying information will be shared according to reporting requirements.

- SOP for Survivors: All survivors receive support as outlined in HPA's Standard Operating Procedures (SOPs), detailed in the Handling Framework. Local offices maintain context-specific referral pathways that safely connect survivors to essential services, including health care, psychosocial support, case management, safety/security, justice, and legal aid.

5.4. Responding

HPA takes immediate action to identify and address reports of harm to program participants or children. When responding to any breach or concerns, HPA prioritises the safety, well-being, and involvement of the victim. All measures taken to address a safeguarding concern must consider the victim's best interests and be sensitive to their gender and other identities while ensuring their safety and safeguarding.

- Case management: Each case is closely monitored according to the handling framework to support victims' needs, manage the investigation process, and ensure appropriate actions are taken.
- Confidentiality: Staff involved in the complaints process must maintain confidentiality and may be required to sign a confidentiality agreement. Employees who breach confidentiality face disciplinary action, including possible termination. Others working with Health Poverty Action may have their relationship with the organisation terminated. In some cases, confidentiality breaches may constitute legal violations.
- Sanction and Discipline: Organisation policies and procedures include appropriate sanctions and disciplinary measures to protect children and young people from further potential harm. This includes immediate suspension of personnel pending investigation of allegations. Personnel convicted of abusing a child or young person are immediately terminated with cause.

Annex 1. Definitions

| Term | Definition |
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| Abuse | Any form of physical, emotional, sexual, or psychological harm or mistreatment towards a participant. |

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| Accountability | Taking responsibility for one's actions and ensuring that individuals who violate participant safety policies are held accountable for their behaviour. |
| Allegation | An assertion or claim made regarding an incident or behaviour that may violate the participant safety policy. |
| Bullying | Repeated inappropriate behaviour, whether verbal or physical, conducted by one or more persons against another or others, which could reasonably be regarded as undermining the individual's right to dignity. Examples include manipulation of the person's reputation by gossip or ridicule; social exclusion or isolation; threats abuse; etc. |
| Child | A person who is under the age of 18, or under the legal age of majority in their country or region, or as defined by local laws and regulations. Children are entitled to special care, safeguarding and rights as recognised by international conventions and guidelines, including the United Nations Convention on the Rights of the Child. |
| Child Abuse | Child abuse refers to any form of physical, emotional, sexual, or psychological harm or mistreatment towards a child. It involves actions or omissions by individuals or institutions that endanger or impair the child's well-being, development, or dignity. Child abuse can include physical violence, neglect, emotional abuse, sexual exploitation, or any behaviour that causes significant harm or poses a risk to the child's safety and well-being. |
| Child Protection | Ensuring the safety, well-being, and rights of children, including protection from abuse, exploitation, and neglect. |
| Code of Conduct | A set of rules and guidelines that outline expected behaviour and responsibilities of staff, volunteers, and participants in relation to participant safety. |
| Complaints Procedure | A formal process for participants, staff, and volunteers to report grievances or complaints related to participant safety, including steps for investigation, resolution, and follow-up. |
| Confidentiality | The safeguarding of personal information and privacy of participants, ensuring that sensitive information is only shared with authorized individuals on a need-to-know basis. |
| Discrimination | Treating a participant unfairly or differently based on their characteristics or attributes such as race, gender, age, or disability. |

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| Disclosure | The act of sharing information about abuse, harm, or safety concerns with appropriate individuals or authorities. |
| Exploitation | The misuse or taking advantage of a participant for personal gain or benefit. |
| Harassment | Harassment refers to any unwanted, unwelcome, or offensive behaviour, whether verbal, non-verbal, or physical, that is directed towards an individual or a group and creates an intimidating, hostile, or offensive environment. It can include but is not limited to unwanted advances, comments, gestures, or actions that demean, belittle, or discriminate against a person based on their race, gender, age, sexual orientation, religion, or any other protected characteristic. Harassment is a violation of a person's rights and can have a detrimental impact on their well-being and participation in an organisation's activities. |
| Incident Reporting | Documenting and reporting any incidents or concerns related to the safety and well-being of participants, ensuring that appropriate actions are taken to address the situation. |
| Informed Consent | Obtaining permission from a participant or their legal guardian after providing them with all necessary information about the organisation's activities and potential risks involved. |
| Intimidation | Intimidation refers to the act of instilling fear, threat, or coercion in order to control or manipulate someone's behaviour or actions. It involves the use of power, aggression, or force to create a climate of fear, making individuals feel unsafe or vulnerable. Intimidation can take various forms, including verbal threats, physical aggression, bullying, harassment, or any other behaviour intended to instil fear or exert control over others. It is a violation of personal boundaries and can have a significant impact on an individual's well-being and ability to participate freely in an organisation's activities. |
| Monitoring and Evaluation | Regularly assessing and reviewing the effectiveness of participant safety measures, policies, and procedures to identify areas for improvement and ensure ongoing compliance. |
| Participant | An individual who is involved in the organisation's programs, activities, or events. |
| Protection | Action taken to prevent and mediate any potential harm (within legal frameworks), including implementing preventive measures, |

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| | responding to incidents, and ensuring appropriate support mechanisms are in place to safeguard participants' wellbeing. |
| Reporting Mechanism | A formal process or system in place for participants, staff, and volunteers to report concerns, complaints, or incidents related to participant safety. |
| Risk Assessment | Evaluating potential risks and hazards to participants and implementing measures to mitigate or prevent harm. |
| Safeguarding | The proactive implementation of policies, procedures, and practices designed to prevent SEA within an organisation and throughout its work. This includes preventive measures, clear reporting mechanisms, and response protocols to ensure the safety of program participants, staff, and all individuals involved in the organisation's activities. |
| Survivor | A survivor refers to an individual who has experienced abuse, violence, or trauma and has managed to overcome and persevere through these challenging circumstances. The term survivor emphasises the resilience, strength, and courage displayed by individuals who have endured difficult situations and emerged with a sense of recovery and empowerment. |
| Training and Awareness | Providing education and resources to staff, volunteers, and participants to increase their understanding of participant safety, including recognising signs of abuse, prevention strategies, and reporting procedures. |
| Vulnerable Groups | Individuals who may be at a higher risk of harm or abuse due to factors such as age, disability, economic status, or social circumstances. |
| Whistleblower Protection | Safeguards in place to protect individuals who report concerns or incidents related to participant safety from retaliation or adverse consequences. |
| Zero Tolerance | A strict policy that does not tolerate any form of abuse, harm, discrimination, or exploitation towards participants, reinforcing the organisation's commitment to participant safety. |

Annex 2. Reporting under the policy

What Should Be Reported?

The following incidents must be reported under this policy:

1. Internal Cases: All safeguarding concerns and policy breaches where the alleged perpetrator is an HPA Staff member, Associate, or Visitor. This includes concerns related to our interventions, activities, operations, and engagement.
2. External Cases: When the alleged perpetrator is outside the policy's scope (not a Staff member, Associate, or Visitor), report safeguarding concerns involving:
 - a. Sexual abuse and exploitation
 - b. Potential crimes under local legislation
 - c. Other serious forms of violence reported to HPA office/staff or brought to Plan International's attention
3. Legal Requirements: All types of abuse and violence that must be reported under local law, regardless of the perpetrator.

Who Should You Report To?

Each HPA office has designated staff members, known as Safeguarding (and PSHEA) Focal Points, who handle breaches of the Code of Conduct and Programme Participant Safeguarding Policy.

IMPORTANT: If you have a concern, do not hesitate or question whether it should be reported. Make a report within 24 hours to your Safeguarding (and PSHEA) Focal Point, line manager, or Office Director. They will ensure the issue is addressed and make appropriate referrals following local procedures.

You may also submit reports anonymously through HPA's Whistleblowing Policy.

Your local/engaging office must provide written guidance and appropriate training on reporting and responding to safeguarding concerns and breaches of the Global Safeguarding Policy. This guidance will specify what to report and to whom. If you haven't received this information, contact your engaging manager, Office Director, or Safeguarding (and PSHEA) Focal Point.

Annex 3. Declaration

I, the undersigned, [full name], [job title], hereby declare that:

1. I have never been disciplined for misconduct in relation to participants. (“Participants” include beneficiaries of our projects and other community members where we work, as well as fellow staff members, local partner project staff, government partners, and other project stakeholders). I have never been convicted or subject to any investigation for unlawful acts involving the abuse or ill treatment of participants. I am aware that if I fail to declare any such incidents now, this will later result in disciplinary action, which may include immediate dismissal without notice or benefits such as pension, regardless of labour laws governing the contract.
2. I have read and understood the standards and guidelines outlined in Health Poverty Action’s Programme Participant Safeguarding Policy. I agree with the principles contained therein and accept the importance of adhering to participant safeguarding policies and practices while working with Health Poverty Action.
3. I undertake to draw to the attention of my managers any behaviour or suspicion of sexual exploitation, ill treatment, or abuse of participants (including bullying, verbal, physical or sexual harassment, rape, exploitation, intimidation, victimisation, racial or ethnic discrimination or harassment, behaviour that shows a lack of respect for the dignity of other, behaving in an obviously culturally insensitive manner, attempt to commit fraud, blackmail, or accept or solicit a bribe) within Health Poverty Action programmes, or in other situations that may be brought to my notice. I am aware that failure to declare any such knowledge will result in disciplinary action, which may include immediate dismissal without notice or benefits.
4. I have been informed that in the event of my being suspected of inappropriate or abusive behaviour in relation to participants, Health Poverty Action reserves the right to take protective measures, including provisional suspension from duties, disciplinary action, which may include immediate dismissal without notice or benefits.
5. I have been informed that, in the event of confirmed evidence of my involvement in incidents jeopardising the safeguarding of participants, Health Poverty Action will take appropriate administrative and/or legal measures both in the country where the incident is alleged to have taken place and in my country of domicile, in addition to professional disciplinary action, which may include immediate dismissal without notice or benefits.
6. I have been informed that, in the event of termination of contract on the grounds of an incident that is against the Code of Conduct, Health Poverty Action reserves the right to inform other agencies who apply for references of the reason for the termination of contract.

Signature:

