

**PLAN Health Advocacy and Development Foundation  
(PLAN Foundation)**

**[www.planfoundation.org.ng](http://www.planfoundation.org.ng)**



# **Safeguarding Policy**

**Revised 2024**

Chairman: Board of Trustees

Secretary: Board of Trustees

**PLAN Health Advocacy and Development Foundation  
Safeguarding Policy**

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## **Preamble**

PLAN Foundation's vision is of a Nigeria where the individual, family and community are adequately empowered to protect themselves against poverty, underdevelopment and the spread of diseases.

PLAN Foundation recognizes that sexual and reproductive health rights cannot be confined to the health sector and that realizing these rights can have a significant and positive global impact. This emphasis on rights directly underpins PLAN Foundation's 'SEAT' values: **Shared Responsibility, Equality, Accountability and Transparency.**

To achieve transformational change leading to good health, social and economic progress, PLAN Foundation partners with diverse people and organizations across various sectors with the shared goal of empowering communities, young people, women and other vulnerable people to determine their futures.

As part of this vision, PLAN Foundation is committed to safeguarding all people, particularly children, vulnerable adults and beneficiaries of assistance from any harm that may be caused due to contact with PLAN Foundation. This includes harm arising from:

- The conduct of staff, associates and partners
- The design and implementation of programs and activities

### ***What is Safeguarding?***

Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults and children, from harm; and to respond appropriately when harm does occur.

### ***Accountability Statement***

PLAN Foundation takes this policy very seriously, and the safeguarding mandate comes from PLAN Foundation's Senior Management Team and Board of Trustees.

The Safeguarding Policy applies to all PLAN Foundation staff, associates, and partners who must comply with its requirements and understand the sanctions that may be applied for breaches of the policy. Where required by law or local practices, PLAN Foundation Headquarters and/or its Regional/Zonal/State Offices may enhance the standards as set out in this policy. This commitment will be evidenced through signing the policy and the Code of Conduct. Training in this policy is mandatory for all PLAN Foundation staff, associates, and partners.

The Board of PLAN Foundation is ultimately accountable for this policy. The Executive Director/Chief Executive Officer (ED/CEO), Senior Management Team and Trustees of PLAN Foundation are responsible for its implementation. It is the responsibility of all representatives of PLAN Foundation to raise any concerns regarding sexual exploitation and abuse. PLAN Foundation takes all concerns and complaints seriously and will initiate a comprehensive investigation of complaints that are in violation of this policy and take disciplinary and possibly legal action as warranted.

## **1. Policy Approach**

This policy details how PLAN Foundation achieves its obligations and applies to all staff, associates and partners regardless of their location.

### **1.1 Framework Principles**

This policy and the entire Safeguarding Framework are guided by the following principles:

#### **1.1.1 Safeguarding**

PLAN Foundation is committed to all community members as outlined in the definitions as having the right to safeguarding and protection from sexual exploitation and abuse irrespective of ability, ethnicity, faith, gender, sexuality, and culture.

#### **1.1.2 Shared Responsibility**

For the Safeguarding policies and practices to be effective in reducing the risks to beneficiaries and communities, all at PLAN Foundation must share the responsibility for implementation and improvement. As such, a failure at one level of the organization constitutes a failure at all levels of the organization.

#### **1.1.3 Effective Communication**

PLAN Foundation effectively communicates with all staff, associates, and partners in simple and accessible language to create a positive and accessible culture where responsibilities for safeguarding are clear.

#### **1.1.4 Continuous Improvement**

PLAN Foundation provides assessment, reflection and feedback mechanisms to inform the organization of any improvements that can be made to policies and practices. These mechanisms include quarterly incident reviews, regular safeguarding audits, as well as regular policy review, and refresher training.

### **1.1.5 Dignity and Respect**

PLAN Foundation creates a work environment where the principles of dignity and respect for all staff, associates, partners and communities, in all locations are at the heart of what the organization does. Included in this are the principles of being non-judgmental when hearing safeguarding concerns and complaints.

### **1.1.6 Zero Tolerance**

PLAN Foundation has zero tolerance for any violations of the safeguarding policy.

### **1.1.7 Confidential**

PLAN Foundation Is committed to confidentiality and information will not be shared outside of the Safeguarding Committee unless it is absolutely necessary, and the safety of the person involved is a concern.

## **2. Policy Implementation**

### **2.1 Policy Map**

This policy will guide PLAN Foundation staff, associates, and partners through the definitions of safeguarding as well as governance and responsibilities. The associated procedures and resources will provide information on how to report any complaints, the format of the reporting, and how these complaints will be managed.

### **2.2 Governance**

The ED/CEO, together with the Senior Management Team, has ultimate responsibility for this policy and the Safeguarding Framework and its proper management, using a systematic approach. As such, the ED/CEO and the Senior Management Team will receive a summary of any reported sexual exploitation and abuse incidents and follow-up measures taken at each Senior Management Team meeting.

### **2.3 Responsibilities**

PLAN Foundation is committed to following through on the following measures in order to ensure that the organization is observing its safeguarding commitments:



## 2.4 Risk Assessment

PLAN Foundation will conduct safeguarding risk assessments in all areas of work. Additional risk assessment information in relationship to Child Safeguarding can be found in the Child Safeguarding Policy.

## 2.5 Minimizing and Addressing Risks

Strategies to prevent or minimize risk will include:

2.5.1 Ensure that safeguarding is embedded within the organizational culture.

2.5.2 Clear roles and responsibilities in relationship to safeguarding are established at all programming levels.

2.5.3 Capacity building and training on safeguarding is delivered to all staff.

PLAN Foundation is committed to ensuring that activities do not put vulnerable populations and children at risk and will put measures into place to mitigate this risk.

## 2.6 Safe Recruitment

PLAN Foundation has developed robust procedures to ensure that safeguarding is at the heart of all recruitment for staff and associates. Recruitment and selection guidelines integrate safeguarding into all stages of the process.

These stages include:

**Person Profile/Job Description:** PLAN Foundation will ensure that the skills and knowledge required to work safely are included in within the person profile and/or job descriptions.

**Job Advertisement:** A clear statement on PLAN Foundation's commitment to safeguarding will be included.

**Interviews:** Interviews will include at least one question on safeguarding.

**Reference Checks:** Reference checks will include a question related to safeguarding.

**Proof of Identification/Qualifications:** Candidates for selection will be required to verify their identity as well as qualifications.

**Police Checks:** All positions will require a police check. Depending on the timing of obtaining a police check, an individual may be offered a position while the police check is being carried out.

**Code of Conduct:** All newly hired staff must sign the Code of Conduct.

**Probationary Period:** During the probationary period, staff will be monitored for any safeguarding concerns.

**Induction:** All newly hired staff will be briefed and oriented to the Safeguarding Policy.

## 2.7 Education/Training

In order for PLAN Foundation to meet its commitments to safeguarding, it is essential that everyone associated with the organization has clear education and training. All PLAN Foundation staff and associates will be provided with the Safeguarding Policy on induction. They will be required to sign that they have read and understood the policy as well as the Code of Conduct. Additional training in relationship to child safeguarding is outlined in the Child Safeguarding Policy.

## **2.8 Safe Program Design**

Safeguarding will be considered at every stage of program development and implementation.

## **2.9 Communications Guidelines**

PLAN Foundation's safeguarding policy is a publicly available document. All staff, associates, partners, and communities will be made aware of this policy and how to raise a concern.

## **2.10 Online Protection**

PLAN Foundation will ensure that staff have education and awareness around the appropriate use of technology including the internet, mobile phones and social media in relationship to safeguarding. All staff and associates will adhere to PLAN Foundation's IT policy.

## **2.11 Reporting & Responding to Concerns**

The safeguarding procedures for reporting outlines how safeguarding concerns can be reported as well as the associated investigations and follow-up procedures.

## **2.12 Whistleblowing**

As referred to in PLAN Foundation's whistle-blowing policy, all reports, complaints and disclosures shall be treated in confidence. Such reports, complaints and disclosures may be submitted, using the **Incident Reporting Form** (See Template attached to this Policy) anonymously for the attention of, and investigation by, the Safeguarding Focal Person via email [ethics@planfoundation.org.ng](mailto:ethics@planfoundation.org.ng) or by calling the organization's whistleblowing hotline at **+234-906-315-4517**.

## **2.13 Safeguarding Committee**

A Safeguarding Committee shall be established at the organization's Headquarters and shall be responsible for informing and training all staff in safeguarding policies and procedures. They shall also be responsible for receiving and investigating any safeguarding complaints.

The Safeguarding Committee shall be trained in all of the safeguarding policies, as well as reporting and investigations. The Safeguarding Committee will also be provided with specialized Psychological First Aid training, so that they are able to offer appropriate support as required.

The Safeguarding Committee is comprised of 5 members thus:

1. The Safeguarding Focal Person who shall be the Compliance Officer of the organization and Chairperson of the Safeguarding Committee. The Safeguarding Focal Person shall be the Compliance Officer of the organization and be directly responsible for implementing the organization's Safeguarding Policy
2. One woman in a Senior Management Role.
3. One man in a Senior Management Role
4. Two members from across different departments.

The organization shall ensure that there is diversity and equal gender representation on the Safeguarding Committees will.

#### **2.14 Safeguarding Management**

All managers and directors hold overall accountability for this policy and its implementation under the direction of the Safeguarding Committee. Managers also have a responsibility to support and develop systems that maintain an environment where all parties involved with PLAN Foundation understand how to behave, how to raise complaints and concerns, and what action will be taken.

#### **2.15 PLAN Foundation's Obligations**

PLAN Foundation believes that all people have a right to safeguarding and will not tolerate its staff, associate, or partners engaging in any sort of behaviour that puts beneficiaries or communities at risk. To that end, PLAN Foundation commits to:

1. Creating a safe culture for both, those it serves and those who work for and represent the organization.
2. Following through on any complaints and concerns in a timely manner through its Safeguarding Committee and taking each complaint seriously.
3. Sensitizing staff, associates, partners, and communities around how to make a complaint.
4. Ensuring zero tolerance towards any child or adult safeguarding related concern, or sexual exploitation or abuse
5. Building a culture of dignity, honour and respect where all those who work with and are served by PLAN Foundation feel empowered to report complaints.
6. Educating staff, associates, and partners that any violation of the policy may constitute gross misconduct and are grounds for termination of employment and possibly legal action.
7. Providing information on how to report complaints and the investigation procedure.

8. Ensuring that all staff, associates, and partners as well as the general public have access to the Safeguarding Policy and Procedures as well as all other related safeguarding policies.
9. Ensuring that this Safeguarding Policy and **Incident Reporting Form** are conspicuously displayed on the organization's website along with the contact details of the Safeguarding Focal Person.
10. Ensuring that provisions are made for identifying, mitigating and addressing Safeguarding risks on the organization's Risk Register and are regularly updated in line with peculiarities of new projects as well as new and emerging issues.

## **2.16 Staff Responsibility**

All staff, associates, and partners are required to adhere to this policy at all times, and are obliged to report any safeguarding suspicions to the Safeguarding Focal Person as stipulated in Section 2.12 above. All staff, associates, and partners are required to sign the associated Code of Conduct, and an acknowledgement of having read and understood the policy.

Under the Safeguarding Policy, all PLAN Foundation staff, associates, and partners must not:

### **2.16.1 Child Safeguarding**

- Engage in sexual activity with anyone under the age of 18.
- Sexually abuse or exploit children.
- Subject a child to physical, emotional or psychological abuse, or neglect.
- Engage in any commercially exploitative activities with children, including child labour or trafficking.

### **2.16.2 Adult safeguarding**

- Sexually abuse or exploit at risk adults.
- Subject an at-risk adult to physical, emotional or psychological abuse, or neglect.

### **2.16.3 Protection from sexual exploitation and abuse**

- Exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance.
- Engage in any sexual relationships with beneficiaries of assistance, since they are based on inherently unequal power dynamics

Additional details on the above can be found in the associated policies.

**PLAN Health Advocacy and Development Foundation  
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## **2.17 Implementation & Review**

To meet with sector best practice, PLAN Foundation agrees to review this policy and the entire Safeguarding Framework for ratification by the Board of Trustees every two years, as a minimum. It is the responsibility of the Executive Director and Chief Executive Officer to complete this review, in collaboration with any key internal stakeholders or external third-party providers.

## **3. Definitions**

### **Beneficiary of Assistance**

Someone who directly receives services from PLAN Foundation.

### **Child**

A person below the age of 18.

### **Harm**

Psychological, physical and any other infringement of an individual's rights.

### **Psychological harm**

Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation.

### **Protection from Sexual Exploitation and Abuse (PSEA)**

The term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by staff or associated personnel. The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13).

### **Safeguarding**

Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur.

Safeguarding applies consistently and without exception across programs, partners and staff. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialize. Those systems must be survivor-centred and also protect those accused until proven

guilty. Safeguarding puts beneficiaries and affected persons at the centre of all PLAN Foundation does.

### **Sexual abuse**

The term 'sexual abuse' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

### **Sexual exploitation**

The term 'sexual exploitation' means any actual or attempted abuse 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 definition includes human trafficking and modern slavery.

### **Survivor**

The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive, however it is the individual's choice how they wish to identify themselves.

### **At risk adult**

Sometimes also referred to as vulnerable adult. A person who is or may be in need of care by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

**PLAN Foundation staff** refers to individuals who receive a regular salary for work in any part of PLAN Foundation Headquarters, including all Regional/Zonal/State Offices and any other location where PLAN Foundation operates.

**PLAN Foundation associates** refers to a range of paid and non-paid individuals who have committed to work with or support PLAN Foundation. It includes volunteers, interns, and consultants and contractors.

**PLAN Foundation managers** refers to PLAN Foundation staff who have responsibility for line managing or supervising the work of PLAN Foundation staff or PLAN Foundation associates.

**PLAN Foundation partners** refers to staff and/or representatives of partner organizations and local governments when operating in partnership agreement with PLAN Foundation.



## Incident Reporting Form

General Information	
Reported By:	Date/Time Detected:
Department:	Date/Time Reported:
Title:	Mobile:
Phone:	Email Address:
Postal Address:	
Physical Address:	
Additional Information:	
Incident Details	
Type of Incident: <b>Confidentiality / Integrity / Availability/Sexual or Physical Abuse/Exploitation</b>	
Impacts on the Department (total failure, business as usual etcetera):	Type of affected System: Staff, Host Community, Community Member/Beneficiary, Finance, Administration, etcetera.
Incident Details:	
Location Details:	Safeguarding Focal Person:
Actions Taken:	