MAG SAFEGUARDING FRAMEWORK

POLICY STATEMENT
MAG’s vision is a safe future for men, women and children affected by conflict and insecurity. We believe all people have a right to live their lives free from sexual harassment and abuse, sexual violence, bullying, exploitation and any abuse of power regardless of age, gender, sexuality, disability, religion or ethnic origin.

MAG will not tolerate its employees, volunteers, consultants, partners or any other representatives associated with the delivery of its work carrying out any form of sexual harassment, abuse or exploitation. Such behaviour goes against the very values and mission of our organisation. Safeguarding is a priority for MAG.

Sexual harassment, violence, exploitation and abuse, as well as a range of non-sexual abuses of power, take various forms and can happen to anybody at any time during their lives, but are more likely when one person is in a position of power over another. We recognise that there are unequal power dynamics across the organisation and in relation to those we serve, and that we face an inherent risk of some individuals exploiting their position of power for personal gain.

We acknowledge that we must hold ourselves to account and ensure that we provide a safe and trusted environment for anyone that comes into contact with our work. This duty extends both inside the organisation and covers all staff, trustees, volunteers, contractors; and outside the organisation which includes beneficiaries, communities, partners and other stakeholders.

It is the responsibility of anyone representing MAG to raise any concerns that they have or that are reported to them. It is not an individual’s responsibility to decide whether or not sexual harassment, abuse, or exploitation has occurred.

PURPOSE
The Safeguarding Framework sets out MAG’s approach to preventing sexual exploitation, abuse, harassment and bullying.

The Safeguarding Framework and associated policies aim to:
- ensure staff and other representatives of MAG are given every opportunity to become aware of the standards and expectations that we have set ourselves
- provide a clear system of how to report concerns as soon as they are identified or suspected
- provide guidance on how MAG will respond rapidly to any concerns and carry out investigations diligently
- ensure staff receive appropriate training and support
- comply with international standards in relation to safeguarding

SCOPE
This framework and its associated policies apply to all MAG employees (international, national and HQ), volunteers, consultants, contractors, trustees, plus accompanying partners and family members of international staff. Where employees or staff are referred to in this document, these groups of people are included.

MAG’s partners and suppliers are required to sign a copy of the Policy on Personal Conduct and follow its principles, as well as the principles contained in MAG’s wider Safeguarding Framework, unless their own organisation has a Code of Conduct and Safeguarding Framework that meets the required standard¹.

¹ Minimum standard being:
- commitment to the Secretary General’s Bulletin on Special Measures for protection from sexual exploitation and sexual abuse;
- recognising the rights of all beneficiaries to be protected from sexual exploitation and abuse;
- sets out how this applies to all ‘staff’;
- identifies and manages risk;
- ensures the organisation’s Code of Conduct integrates safeguarding measures into all areas of the organisation.
Where beneficiaries are referred to in this framework this refers to someone in receipt of MAG’s assistance – see Annex 1.

This framework also applies to job applicants, potential applicants and former employees in relation to how they will be treated by MAG.

DEFINITIONS
MAG defines safeguarding as a framework and set of measures that are intended to safeguard everyone who works in, or comes into contact with the organisation. The scope of this includes behaviour or any act that involves one person using their power or influence over another person; ensuring staff, operations and programmes, do no harm, or expose individual to abuse or exploitation, whilst protecting staff from inappropriate behaviour such as bullying and all forms of harassment.

Safeguarding measures are to:
• establish safe and respectful workplaces which are free from harassment, abuse, and discrimination,
• ensure the safety and protection of groups, including children and vulnerable adults, with whom the organisation is in contact
• maintain MAG’s reputation by high standards for good governance, accountability and sound management by preventing, addressing and learning from instances of wrongdoing.

For a definitive set of definitions that relate to safeguarding see Annex 1.

APPLICATION
MAG’s Approach
Our approach will be survivor centred, within an organisational culture that aims to prevent harm and abuse from occurring, but which responds quickly and thoroughly when it does happen. We will learn from experience and share good practice throughout the organisation.

We will work towards:

Survivor support and enhanced accountability
• Protecting the dignity and safety of the people our work serves
• Ensuring victims and survivors are central to our safeguarding response
• Being transparent and sharing progress
• Ensuring rigorous and inclusive reporting and complaints processes

Cultural change
• Driving cultural change and addressing structural inequalities from the top
• Ensuring consistency in approach
• Collaborating to improve employment practice

Minimum standards
• Applying internationally recognised standards and practices including the Protection from Sexual Exploitation and Abuse (PSEA) index of the Core Humanitarian Standard (CHS)
• Collaborating with others in our sector to advance global safeguarding practice
• Ensuring policies and practice address the needs of vulnerable groups

Organisational capacity and capability
• Improving and sharing expertise of staff, partners and agencies with whom we work or collaborate
• Equalise relationships between organisations delivering and receiving aid
• Testing and scaling innovative technology solutions and as part of the wider sector
It is accompanied by MAG’s Safeguarding Strategy (2018 – 2021), Safeguarding Standards, Safeguarding Work Plan and associated policies (listed later). These all detail the actions we will take to strengthen our approach to safeguarding.

Roles and Responsibilities
The Safeguarding Framework places a number of responsibilities on various groups of people involved in MAG’s work. These are as follows:

MAG’s Board of Trustees: have a duty of care to ensure that appropriate policies and procedures are in place to prevent abuse from taking place and to appropriately manage any concerns. They also have a responsibility to ensure that all appropriate issues are reported in line with best practice and to appoint a Safeguarding Trustee Focal Point who will provide subject matter expertise and has delegated responsibility on behalf of the Board for ensuring that MAG maintains effective safeguarding policies, procedures and practices.

The Board of Trustees also have responsibility for reporting to the Charity Commission and any other relevant regulatory body in the UK or other location. An issue will be reportable if it results in, or risks, significant loss of MAG’s money or assets, damage to MAG’s property or harm to MAG’s work, beneficiaries or reputation.

The responsibility to report safeguarding issues will apply when:
- beneficiaries have been, or alleged to have been, abused or mistreated while under MAG’s care, or by someone connected with the MAG, for example a trustee, staff member or volunteer
- there has been an incident where someone has been abused or mistreated (alleged or actual) and this is connected with MAG’s activities
- there has been a breach of procedures or policies which has put beneficiaries at risk, including failure to carry out checks which would have identified that a person is disqualified in law, under safeguarding legislation, from working with children or adults.

Issues should be reported as soon as a concern is raised or a suspicion is identified. Regulatory action may be taken against MAG and its Board for failure to report issues in line with the Charity Commission’s expectations.

As well as reporting to the Commission, depending on the incident, there may also be a requirement to notify the police, local authority and the relevant regulator or statutory agency including institutional and/or private donor(s).

Board Sub-Committees:
Delegated responsibility rests with the following board sub-committees in relation to safeguarding:

The Governance Nominations and Review Committee (GNRC) maintains oversight of MAG’s incident reporting to the Charity Commission and any other relevant regulatory bodies. The committee will ensure that incident reporting practice is in line with the Commission’s expectations and with sector good practice.

The Health, Safety, Security and Safeguarding Committee (HSC) provides strategic oversight for all aspects of safeguarding at MAG and will ensure that policies and procedures are up to date, effective, appropriate and fully implemented. The HSC will review the Safeguarding Register and will ensure that appropriate action is taken in relation to any issues.

GNRC and HSC will be notified immediately of any potentially serious incidents as soon as they are reported through appropriate channels. This will enable the GNRC to ensure that all reporting to the Charity Commission takes place within recommended timescales. The HSC will be responsible for fulfilling any further reporting requirements including responding to requests for information.

MAG’s Leadership: will ensure the following principles are upheld:
- build a culture of openness to enable issues and concerns about safeguarding to be raised and discussed
• build a sense of accountability between staff so that potential poor or abusive behavior can be challenged
• maintain a reputation of robust standards and high standards of working

MAG’s Safeguarding Lead reports to the People and Organisational Development Director, who in turn reports to the Chief Executive.

Management responsibilities: all managers have a particular responsibility to uphold the standards within each policy and to set an example ensuring that a culture of dignity and respect is maintained. Managers should encourage an open and transparent way of working that facilitates a strong safeguarding culture within and between teams. As well as upholding standards themselves, managers are expected to ensure that all staff understand the provisions clearly and challenge any unacceptable behaviour. In addition, managers must ensure that any reports or complaints are taken seriously and investigated promptly and thoroughly. All MAG programmes have a responsibility for ensuring that standards contained within each policy are upheld in each location and policies are translated into the relevant local language and understood by all.

All individuals: creating a safe working environment at MAG is everyone’s responsibility and failure to act on concerns or disclosures relating to sexual harassment, abuse and exploitation is not an option.

MAG recognises that often employees will be the first to know when there is cause for concern. All staff and partners have a responsibility to act with due care and attention to safeguard the wellbeing of every person, specifically those who are vulnerable. All individuals should remain vigilant, be prepared to take action and understand what to do in the event there is a concern to raise. Therefore, all MAG representatives should understand and abide by the standards set out within the policies that uphold this framework.

All MAG employees are obliged to report any suspicions of sexual exploitation, abuse or harassment of others. Failure to report suspicion of abuse relating to someone else to a relevant person is a breach of MAG’s policy, and could lead to disciplinary action being taken. If necessary, this report can be made anonymously. Although we strongly encourage reporting through the available channels, for the avoidance of doubt, there is no obligation placed on any individual to report any incident that has happened to them. However, where there is a clear legal requirement placed on MAG to report, the decision will be made by MAG in consultation with the alleged subject of abuse.

Safeguarding Standards
MAG has established a set of safeguarding standards. A summary can be found here and full details are in Annex 2:

Safe Environment – the organisational culture for safeguarding
• MAG’s workplace is built on respect, tolerance, diversity and inclusion that delivers a respectful environment for all staff, and supports staff to create a safe environment in which to deliver the organisation’s work.

Safe People - recruitment, induction, training, staff conduct and equal opportunities
• MAG’s HR policies, processes and systems set out, and implement, organisational responsibilities around the employee lifecycle.
• Ensure staff with responsibilities for safeguarding are appointed and skilled to undertake their roles

Safe Programmes - risk management in programmes and partnership arrangements
• MAG’s programmes and projects are designed and delivered in a manner which prevents harm and abuse to the people with whom we work and the communities in which we work.

Safe Communications - use of information and images
• MAG’s communications and fundraising activities feature appropriate images and stories of children and communities and ensure that they are not exposed to harm and abuse.
Safe Response - *whistle-blowing and investigations*

- MAG treats any allegations related to safeguarding extremely seriously. We strive to learn and identify areas in which we could improve, and welcome feedback from any stakeholders.
- We commit to respectfully listening and supporting individuals who want to raise a concern or make a complaint. We will also ensure that genuinely held concerns will be thoroughly investigated.

Safe Governance – *accountability for safeguarding*

- MAG’s governance is based on our values, and promotes transparency, probity and accountability.

Policies and Procedures

The following policies and procedures are in place to ensure that appropriate standards are maintained. A summary can be found here and full details are in Annex 3:

<table>
<thead>
<tr>
<th>Policy Ref</th>
<th>Policy name</th>
<th>Date of next review</th>
</tr>
</thead>
<tbody>
<tr>
<td>HR/POL/042</td>
<td>Policy on Personal Conduct (PPC)</td>
<td>May 2020</td>
</tr>
<tr>
<td>HR/POL/012</td>
<td>Protection of Children and Vulnerable Adults</td>
<td>May 2020</td>
</tr>
<tr>
<td>HR/POL/017</td>
<td>Dignity at Work Policy</td>
<td>May 2020</td>
</tr>
<tr>
<td>HR/POL/019</td>
<td>Equal Opportunities Policy</td>
<td>May 2020</td>
</tr>
<tr>
<td>N/A</td>
<td>Modern Slavery Statement</td>
<td>Within 6 months of the end of MAG’s financial year</td>
</tr>
<tr>
<td>HR/POL/014</td>
<td>Reporting Malpractice (Whistleblowing) Policy</td>
<td>May 2020</td>
</tr>
</tbody>
</table>

Reporting

MAG recognises that the standards outlined in each policy can only be upheld if strong reporting channels exist and are understood by all. As such, each policy outlines how concerns should be raised. Each policy also outlines what action may be taken where incidents or concerns arise.

The Policy on Personal Conduct states that it is the duty and responsibility of all managers, employees and representatives to report any suspicions or incidences of inappropriate behaviour. All MAG employees are obliged to report any suspicions or incidences of inappropriate behaviour towards others. This can be done without sharing details of cases where information has been shared in confidence. Failure to report suspicion of abuse relating to someone else to a relevant person is a breach of MAG’s policy, and could lead to disciplinary action being taken. Although we strongly encourage reporting through the available channels, for the avoidance of doubt, there is no obligation placed on any individual to report any incident that has happened to them. However, where there is a clear legal requirement placed on MAG to report, the decision will be made by MAG in consultation with the alleged subject of abuse.

MAG recognises that not all complainants may be willing to reveal their identity. This does not necessarily have any bearing on the truth of the complaint, but may be an indication of fear of reprisal. Anonymous complaints will be treated as seriously as complaints where the identity is known. The substance of the allegation should still be reported to the SMiC along with the identification of the alleged perpetrator, if known. The wish for anonymity only applies to the complainant and not to the subject of the complaint.

In addition, rumours must not be left unchecked and may be an early warning of a greater problem. MAG will take rumours seriously and must they therefore must be reported and investigated.

Support for Survivors and Victims: MAG will always offer support to survivors and victims, regardless of whether a formal internal response is carried out (such as an internal investigation). Support can include specialist psycho-social counselling, and/or access to other specialist and appropriate support as needed (medical and where possible legal). Survivors and victims can choose if and when they would like to take up the support options available to them. On hearing a complaint or concern, the priority is to ensure and check if the complainant is in need of mental or physical support. All further action will only be taken with the survivor’s agreement or consent unless they are a child or vulnerable adult.
Raising a complaint: anyone can raise a concern or make a complaint to MAG about something they have experienced or witnessed. Reporting/complaints mechanisms are encouraged at all levels of the organisation. Complaints or concerns can be made in any language and arrangements will be made for a confidential translation. In addition, anonymous complaints are accepted and MAG will investigate as far as is reasonably possible.

Safeguarding Focal Points: MAG’s global network of Safeguarding Focal Points support MAG to prevent and respond to sexual harassment, abuse and exploitation by receiving concerns and forwarding these to the team, raising awareness and promoting best practice. Focal points are not required to investigate concerns or complaints themselves.

Community complaints: communities will be informed of how they can make a complaint or raise a concern if necessary. Arrangements will vary between each programme.

Complaints about partners: if MAG receives a complaint about a partner organisation, it will expect the partner to respond quickly and appropriately. MAG will assist the partner to ascertain its obligations under local law to refer the matter to the police or other statutory authorities for criminal investigation. Where appropriate, MAG will work with the partner to address the issue through an appropriate independent investigation. If the outcome is that abuse has occurred, ongoing work with the partner cannot involve the individual(s) concerned. If there is reason to believe that an allegation of abuse has been dealt with inappropriately by a partner then they risk withdrawal of funding or ending the relationship (including networks and consortia).

Complaints from outside of MAG: can be sent in writing to reporting@maginternational.org or directly to the Leadership Team or anyone on the Board of Trustees. This can include someone in receipt of MAG’s assistance (beneficiaries); other people directly affected by MAG policies, actions or our staff; partners and their staff (humanitarian partners and contractors); MAG staff or any visitor to a MAG site or office. The email address is monitored by the Company Secretary and the email received will be forwarded to the appropriate people with oversight by whoever the email was addressed to.

Statutory and external reporting: the decision about whether to refer an allegation to local police or statutory authorities is made by the person who it is alleged has been the subject of abuse (“the victim/survivor” - who may or may not be the complainant). MAG will support the victim/survivor and/or complainant regardless of whether they wish to report to local police/statutory authorities or not. However, MAG’s approach will always be to comply with reporting obligations under local law. Where there is a clear legal requirement placed on MAG to report, this decision will be made by MAG in consultation with the alleged subject of abuse. If someone’s life is in danger or the matter relates in any way to a child or adult at risk, then some decisions may have to be taken by MAG (for example, to contact the police or statutory authority).

The principle of ‘survivor led’ must be balanced against risk and protection of vulnerable groups in every instance. If the victim/survivor is a child or adult at risk, then decisions about their welfare may have to be made by others. However, as far as is possible and appropriate they will be engaged in the conversation about their own welfare.

Regulatory and donor reporting: MAG’s regulatory authorities and donors have different reporting mechanisms in relation to safeguarding incidents. All incidents that involve national, international staff or partners, must be reported immediately to the Regional Director and HQ HR who will be able to advise accordingly.

Implementation
The Safeguarding Framework will be supported by:

- Staffing – a senior level full time safeguarding position will be in place, safeguarding focal points will be recruited across the organisation, safeguarding responsibilities will be included in job descriptions. All staff with responsibility for implementation will receive training.
• **Prevention** – safeguarding will be integrated into all aspects of MAG’s work and systems, including awareness raising from application stage and continuous throughout an employee’s employment at MAG. Risk assessment will be considered at all levels including when working with partners, when designing new programmes and setting up new operations at local and national level.

• **Reporting and responding mechanisms** – steps for raising or reporting safeguarding concerns will be known to all, investigation and incident management procedures are clear and understood: duties and responsibilities are clear for those who have safeguarding responsibilities, in particular managers, HR teams and focal points

• **Implementing, maintaining, reviewing and monitoring the safeguarding policy** – training and capacity building of staff and partners, monitoring and reporting and continuous review of the framework

• **Budget** – will be available to support with organisation wide safeguarding activities.

**Monitoring and Review**
In order to ensure the standards within each policy remain relevant and appropriate, each policy will be reviewed every in 12 months; activities in the safeguarding work plan are reported to the Board sub-committees and Board every quarter; activities at programme level are reported every quarter. All case management is monitored and reported to appropriate Trustees every month.

**REFERENCES:**
*Internal:* all Safeguarding Policies as listed; Gender Statement; Recruitment and Selection Policy; Background Checks Policy; Disciplinary and Grievance Policy, plus guidance on local customs and legal requirements in the country of operation.

*External:*
- IASC Core Principles on PSEA
- UN Secretary General’s Bulletin: Special Measures for protection from sexual exploitation and sexual abuse, 9 October 2003
- The Core Humanitarian Standard (including the PSEA index)
- DfID’s Enhanced Due Diligence Checklist

**APPROVAL AND DATES**
This policy must be approved by The Board of Trustees
This policy was approved by: The Board of Trustees on 7 November 2019
This version takes effect from: 7 November 2019
This policy will be reviewed after 12 months by: 7 November 2020
HSC (annually)
The Board of Trustees (annually)

**POLICY OWNER**
People and Organisational Development Director
## Annex 1: MAG’s Safeguarding definitions

<table>
<thead>
<tr>
<th>List of terms</th>
<th>Definitions</th>
<th>MAG Policy</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Child</strong></td>
<td>a child is deemed to be a person under the age of 18 years</td>
<td>Protection of Children and Vulnerable Adults</td>
</tr>
<tr>
<td><strong>Vulnerable adult</strong></td>
<td>a vulnerable adult is a person aged 18 years or over who is at greater than normal risk of abuse because they may be unable to take care of themselves or protect themselves against harm or exploitation. This may be due to their condition, circumstance or environment. They may have learning difficulties, physical disabilities or mental illness or are dependent on someone else, because of a disability, age or illness.</td>
<td>Protection of Children and Vulnerable Adults</td>
</tr>
<tr>
<td><strong>Protected Characteristics</strong></td>
<td>nine protected characteristics relating to discrimination which are as follows: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.</td>
<td>Dignity at Work &amp; Equal Opportunities</td>
</tr>
<tr>
<td><strong>Direct Discrimination</strong></td>
<td>occurs when someone is treated less favourably than another person because of a protected characteristic they have.</td>
<td>Equal Opportunities</td>
</tr>
<tr>
<td><strong>Indirect discrimination</strong></td>
<td>occurs where a policy applies to everybody, but has a disproportionate impact on people with a protected characteristic</td>
<td>Equal Opportunities</td>
</tr>
<tr>
<td><strong>Associative discrimination</strong></td>
<td>discrimination against a person because they have an association with someone with a particular protected characteristic.</td>
<td>Equal Opportunities</td>
</tr>
<tr>
<td><strong>Perceptive discrimination</strong></td>
<td>discrimination against a person because the discriminator thinks the person possesses that characteristic, even if they do not in fact do so.</td>
<td>Equal Opportunities</td>
</tr>
<tr>
<td><strong>Sexual exploitation</strong></td>
<td>Actual or attempted abuse of a position for sexual purposes. Examples: abusing a situation to gain advantage; sex for work or services; sexual relationships with others in less powerful positions; sex with a minor; payment for sex.</td>
<td>SG poster</td>
</tr>
<tr>
<td><strong>Abuse</strong></td>
<td>any act or omission which results in harm to a child or vulnerable adult. Abuse is generally accepted to usually fall into one of four categories: physical abuse, emotional abuse, sexual abuse and neglect, but may occur in any form.</td>
<td>Protection of Children and Vulnerable Adults</td>
</tr>
<tr>
<td><strong>Abuse</strong></td>
<td>Actual or intentional cruel or violent treatment. Examples: sexual (forced sex), physical (hitting), emotional (playing with someone’s mind) and neglect (putting someone in danger)</td>
<td>Summary in SG poster</td>
</tr>
<tr>
<td><strong>Harassment</strong></td>
<td>unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual. It is behaviour that is considered unwelcome, unwarranted and causes a detrimental effect. Harassment is normally characterised by more than one incident of unacceptable behaviour, particularly if it reoccurs, once it has been made clear by the victim that they consider it offensive. However, one incident may constitute harassment, if it is sufficiently serious.</td>
<td>Dignity at Work and Equal Opportunities</td>
</tr>
<tr>
<td><strong>Harassment</strong></td>
<td>Pressure or intimidation which is unwanted or persistent and results in offence, isolation, humiliation or is a violation of dignity. Examples: verbal comments – that are discriminatory or may make someone feel uncomfortable; physical – touching, staring, making gestures or sexual advances</td>
<td>Summary in SG poster</td>
</tr>
<tr>
<td><strong>Direct harassment</strong></td>
<td>behaviour that an individual finds offensive or causes them harm, which has been primarily directed towards them</td>
<td>Dignity at Work</td>
</tr>
<tr>
<td><strong>Indirect harassment</strong></td>
<td>behaviour that an individual finds offensive or causes harm, even though it is not directed at them</td>
<td>Dignity at Work</td>
</tr>
<tr>
<td>Third Party Harassment</td>
<td>When a member of staff complains of harassment by a person who is not a member of MAG staff. They could for example, be suppliers, sub-contractors, donors, beneficiaries, visitors etc. In these situations, an internal investigation will take place that follows MAG’s process as closely as possible, and the issue may be reported to the third parties’ employer where appropriate and relevant. Or when a third party complains to MAG of having been harassed by a MAG representative.</td>
<td>Dignity at Work</td>
</tr>
<tr>
<td>Bullying</td>
<td>offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power which is intended to undermine, humiliate or denigrate the recipient. It is not based on any one clearly identifiable aspect of the person concerned. It is usually persistent and makes the recipient feel upset, threatened, humiliated or vulnerable and can undermine self-confidence. Bullying behaviour is largely identified not so much by the actions taken, but rather by the effect that it has on the recipient.</td>
<td>Dignity at Work</td>
</tr>
<tr>
<td>Bullying</td>
<td>Actions or words that seek to harm, intimidate, or force in order to gain power and control. Examples: unnecessary criticism, spreading rumours, intentionally undermining, deliberate isolation, making inappropriate personal comments, hitting, pushing, damaging or stealing personal possessions. * advised by HC to use the ACAS definition</td>
<td>Summary in SG poster</td>
</tr>
<tr>
<td>Victimisation</td>
<td>occurs when someone is treated less favourably as a result of action they have taken or are believed to have taken. This can include making a formal complaint about someone or giving evidence against a colleague.</td>
<td>Dignity at Work</td>
</tr>
<tr>
<td>Victimisation</td>
<td>occurs where someone is treated less favourably because they have made / supported a complaint or grievance against an individual, or because they are suspected of doing so.</td>
<td>Equal Opportunities</td>
</tr>
<tr>
<td>Beneficiary</td>
<td>Where beneficiaries are referred to in this policy, this refers to someone in receipt of MAG’s assistance or within a community which is receiving support’.</td>
<td>PPC</td>
</tr>
<tr>
<td>Beneficiary</td>
<td>Where the term beneficiary is used this refers to someone in receipt of MAG’s assistance. This could include but is not limited to: people who will use or may use land or property made safe by MAG through clearance or survey, communities receiving risk education activities in any form, recipients of MAG training, security forces benefitting from MAG’s interventions, and populations in areas of close proximity to ammunition stores.</td>
<td>Protection of Children and Vulnerable Adults/Whistleblowing</td>
</tr>
<tr>
<td>Partner</td>
<td><strong>Contracted partnership</strong>: MAG is contracted or sub-contracted by another organisation to conduct activities, where the partner is not a nation state. <strong>Sub-contracting partnership</strong>: MAG is contracting a partner to conduct activities not covered by MAG’s procurement policy. In most cases, this would be a partner contributing to outputs under a grant. However, this might also include partnerships with research institutes, universities or training providers. <strong>Association partnership</strong>: A formal partnership that might involve a signed joint statement, sharing a public platform, or legal agreement with an organisation that does not involve implementing HMA/AMD activities. As above, this does not include accreditations required from the national authorities in the country of operation.</td>
<td>Partnership Policy</td>
</tr>
<tr>
<td>Whistleblowing / Reporting Malpractice / Raising a Concern</td>
<td>is the action of an employee in making a report about a genuinely held concern they hold of any wrongdoings, misconduct, malpractice, irregularity or illegal act taking place within MAG or any of its programmes.</td>
<td>Whistleblowing/ Reporting Malpractice</td>
</tr>
<tr>
<td>Qualifying Disclosures</td>
<td>The Public Interest Disclosure Act 1998 (UK) provides protection for workers who raise legitimate concerns known as “qualifying disclosures”, about specific matters which are in the public interest.</td>
<td>Whistleblowing/ Reporting Malpractice</td>
</tr>
</tbody>
</table>
## Annex 2: MAG’s Safeguarding Standards

### Safe Environment – the organisational culture for safeguarding

MAG’s workplace is built on respect, tolerance, diversity and inclusion that delivers a respectful environment for all staff, and supports staff to create a safe environment in which to deliver the organisation’s work.

- An organisational safeguarding framework is in place which includes policies and standards of behaviour that MAG staff and its representatives should uphold.
- Framework and policies are translated into local languages and understood by all.
- An open and transparent organisational culture exists that fosters diversity and inclusion.
- Senior leaders model a culture of dignity and respect which contributes to a safe working environment and provides opportunities to discuss safeguarding within and between teams.
- All staff are treated with dignity and respect.
- Unacceptable behaviours within the workplace are challenged.
- Written guidelines are in place and understood that outline expected behaviours by staff and representatives towards staff, representatives and beneficiaries.
- Staff are supported to understand and implement safeguarding measures and appropriate behaviour.

### Level 1:

- **Safeguarding Framework and policies are translated, understood and made available to all staff**
- **Safeguarding discussion included in all staff meetings and opportunities provided in other fora**
- **Posters and promotional materials are displayed in all locations**
- **Leadership are recognised in performance appraisals to be demonstrating safeguarding management competencies**

### Level 2:

- **Safeguarding is included in organisational competency framework**
- **All managers have undergone training on modelling safeguarding cultures**
- **Role models exist across the organisation who proactively champion and support a safeguarding culture across the organisation**
- **Managers are recognised in performance appraisals to be demonstrating safeguarding management competencies**

### Safe People - recruitment, induction, training, staff conduct and equal opportunities

MAG’s HR policies, processes and systems set out, and implement, organisational responsibilities around the employee lifecycle. Ensure staff with responsibilities for safeguarding are appointed and skilled to undertake their roles.

- Safeguarding checks are integrated into the recruitment and on-boarding processes.
- Equality of opportunity is maintained for all candidates and prospective candidates.
- Equality of opportunity is maintained for all staff and representatives.
- It is clear in the policy that a breach of the safeguarding and personal conduct policies would result in disciplinary measures.
- All staff are provided with briefing and training on safeguarding.
- Roles and responsibilities for safeguarding are clear and understood.

#### Level 1:

- **Full background checks being conducted and all posts are risk assessed**
- **Safeguarding interview takes place for “high risk” roles**
- **Country training plans in place**
- **All staff receive induction on safeguarding**
- **Refresher training delivered every 12 months**
- **SGL leads and focal points assigned and HR are supported in safeguarding issues**

#### Level 2:

- **Countries recognised for good practices on diversity, dignity and respect**
- **Staff represent balance on gender and other identities at all levels**
**Safe Programmes - risk management in programmes and partnership arrangements**

MAG’s programmes and projects are designed and delivered in a manner which prevents harm and abuse to the people with whom we work and the communities in which we work.

- The national and local situation, legal context, customs and support services where programmes are delivered is mapped and understood
- Partners work to safeguarding requirements when in contact with MAG programmes
- Risk assessments are carried out and mitigation plans implemented for all programmes, projects and activities involving or impacting on children and communities
- Programme and project plans include activities to safeguard children and communities, activities to raise awareness and sensitivity on potential harm including sexual exploitation and abuse, and which are budgeted for
- Monitoring and evaluation processes include whether programmes, projects and activities are being, or have been, conducted safely
- Outcomes from monitoring the safety of programmes results in programme adjustment and/or feed into organisational implementation plans
- Focal point system and complaints mechanisms are in place

**Level 1:**
- Countries have local context mapping completed
- Risk assessments conducted on every programme
- CLTs (or equivalent) are raising awareness with communities on safeguarding
- CLTs trained to encourage and receive reports on safeguarding
- Clauses on safeguarding included in all active partnership agreements
- Safeguarding in partnership arrangements applied to all partners
- Partners have been risk assessed
- High risk partners are assessed for safeguarding and monitored accordingly
- SG risk is included in programme’s business plans
- Post impact assessments include safeguarding

**Level 2:**
- All programmes/funding proposals include costs for core and project related safeguarding activities

**Safe Communications - use of information and images**

MAG’s communications and fundraising activities feature appropriate images and stories of children and communities and ensure that they are not exposed to harm and abuse.

- Safeguarding measures are incorporated into all forms of media and communications activities
- The best interests of beneficiaries is prioritised over the opportunity for increased positive public profile and advocacy
- Beneficiaries provide voluntary and informed consent on the use of information and images
- Beneficiaries are portrayed with dignity and no identifying information is made public
- Information and images of beneficiaries is stored securely
- Media representatives are chaperoned and are subject to pre-visit safeguarding checks and adherence to safeguarding protocols

**Level 1:**
- Consent forms and arrangements in place
- Images and stories conform to good practice
- Secure platforms used for storing and sharing images and stories

**Level 2:**
- Staff working to comprehensive communication guidelines and ensuring external stakeholders e.g. media are managed according to these guidelines
Safe Response - whistle-blowing and investigations
MAG treats any allegations related to safeguarding extremely seriously. We strive to learn and identify areas in which we could improve, and welcome feedback from any stakeholders.

We commit to respectfully listening and supporting individuals who want to raise a concern or make a complaint. We will also ensure that genuinely held concerns will be thoroughly investigated.

- Confidential complaints and whistle-blowing mechanisms are in place, understood and work effectively for all safeguarding issues
- Confidentiality is maintained throughout and there are clear repercussions for breaching confidentiality
- Action is taken to support and protect survivors and whistle blowers
- All suspected cases of abuse are investigated thoroughly and resolved promptly and without prejudice
- Staff are protected from malicious or frivolous complaints
- The formal legal context, customs and support services relating to safeguarding are used when appropriate to deliver a safe response
- Notwithstanding confidentiality and privacy, lessons are learned and shared across the organisation

Level 1:
- Reporting/complaints mechanism advertised throughout offices and in communities using posters
- Information about reporting mechanisms are included in all-staff meetings
- Countries are receiving reports on safeguarding concerns from staff
- Programmes are aware of and are actively demonstrating their responsibility to report both internally and externally
- Countries and MAG HQ are investigating cases effectively
- Continuous review and learning of how incidents are managed and handled is conducted
- Set out support and approach for supporting victims (of SG incidents) and whistle blowers
- Regularly report on incidents and actions taken on the safeguarding work plan

Level 2:
- Countries are receiving reports on safeguarding concerns through complaints mechanisms
- Skills in programmes to receive reports and support victims
- At least one member of the country staff is a skilled investigator

Safe Governance – accountability for safeguarding
MAG’s governance is based on our values, and promotes transparency, probity and accountability.

- MAG’s Board of Trustees have a duty of care to ensure that appropriate policies and procedures are in place.
- MAG’s Board of Trustees have a responsibility to ensure that all issues are reported in line with obligations and best practice.
- All managers have a responsibility to uphold the standards within each policy, ensure all staff understand the provision, challenge unacceptable behaviours and that a culture of dignity and respect is maintained
- MAG’s governance and accountability arrangements ensure that staff do not engage in inappropriate behaviour and MAG is able to conduct its business in line with the highest ethical standards

Level 1:
- Managers have ensured that all staff understand what safeguarding means and what their obligations and duty of care are
- Board Safeguarding focal point in place
- Regular management communications include key topics/points on safeguarding, and provide information on safeguarding cases and how these have been dealt with
- The Board regularly review safeguarding policies, processes and outcomes to develop and enhance delivery

Level 2:
- Country audits rate safeguarding arrangements as exceeding expectations
### Annex 3: Summary of Safeguarding Policies v1

<table>
<thead>
<tr>
<th>Policy</th>
<th>Key messages</th>
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<tr>
<td><strong>Policy on Personal Conduct</strong></td>
<td>All representatives of MAG and should recognise that their behaviour can bring the organisation into disrepute and damage the reputation and standing of MAG amongst beneficiaries, partners, funders, authorities and suppliers. Sets out expected standards of personal behaviour and ensures that professional and personal actions do not bring the organisation into disrepute.</td>
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<td></td>
<td>• Avoid conflicts of interest</td>
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<td>• Adopt the highest standards of personal behaviour</td>
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<td>• Avoid criminal activity</td>
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<td>• Treat all with dignity and respect</td>
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<td>• Use resources responsibly</td>
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<td></td>
<td>• Work in a safe way</td>
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<td></td>
<td>Standards are mandatory and full compliance is expected under all circumstances. All representatives are expected to sign to say they understand and agree with the policy. Managers are expected to role model behaviour and to act on concerns.</td>
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| **Protection of Children and Vulnerable Adults Policy** | MAG is committed to safeguarding children and vulnerable from harm. Any form of abuse towards children or vulnerable adults will not be tolerated.  
  • Provides guidance on how to protect children and vulnerable adults from harm  
  • Describes how concerns can be raised and dealt with  
  • Makes clear that everyone must report concerns where children and vulnerable adults may be at risk  
  • Sets out how abuse is prevented, reported and responded to |
|**Dignity at Work Policy**                   | All staff should be free to carry out their work with dignity and respect in an environment that is free from discrimination, intimidation, harassment and bullying. MAG will take a zero-tolerance approach to any behaviours which compromise these basic rights.  
  • Defines harassment, bullying and victimisation  
  • Sets out acceptable behaviours for staff and identifies the responsibilities of managers and others in upholding the standards.  
  • Explains how and when to raise concerns about your own or someone else’s treatment at work and how they will be resolved |
|**Equal Opportunities Policy**               | MAG is committed to equal opportunities and strives towards preventing discrimination in all aspects of programme management (design, implementation, monitoring, evaluation) and employment (recruitment, promotion and training). MAG will take a zero-tolerance approach to any form of discrimination.  
  • Sets out protected characteristics and defines discrimination in its different forms, harassment and victimisation  
  • Protected characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation  
  • Describes how MAG will strive towards equality of opportunity in programme management, recruitment, employment and training  
  • States that employees are obliged to report any concerns about discriminatory practice |
|**Modern Slavery Statement**                 | At MAG, we value not only our own people, but those whom we serve; our beneficiaries and their communities, and so must be vigilant in both our recruitment, employment and supply chains  
  • Defines modern slavery  
  • Sets out the steps that MAG will take to prevent acts of modern slavery and exploitation taking place.  
  • Includes: raising awareness so that concerns can be voiced, ensuring employment and remuneration practices are fair, and challenging suppliers to lead the fight against slavery and exploitation. |
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<th>Whistleblowing Policy</th>
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<td>MAG is committed to ensuring that genuinely held concerns will be thoroughly investigated and anyone who raises a concern will be protected against victimisation and discrimination. It encourages employees and others working for MAG who come into contact with our work who have serious concerns about any aspect of MAG's work to come forward and voice those concerns.</td>
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<td>- Defines whistleblowing, reporting malpractice and raising a concern</td>
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<td>- Sets out the process for reporting a concern</td>
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<td>- Explains how issues will be dealt with</td>
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<td>- Requests staff to use internal procedures before reporting externally</td>
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<td>- Assures confidentiality and protection from victimisation and harassment</td>
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<td>- Clarifies that malicious/untrue allegations will not be tolerated</td>
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