

# **VSO GLOBAL SAFEGUARDING POLICY**

# 1. Introduction and Purpose

# 1.1 Commitment to Safeguarding and Protection from Sexual Exploitation, Abuse and Harassment (PSEAH)

Safeguarding at VSO encompasses all measures to prevent and protect individuals from abuse, including child abuse, sexual exploitation, sexual violence, and harassment. VSO is firmly committed to preventing sexual exploitation, abuse, and harassment across all operations and partnerships. This commitment is embedded in a robust safeguarding framework aligned with international standards, including the UN Secretary-General's Bulletin and the Inter-agency standing committee (IASC) Six Core Principles. VSO upholds a zero-tolerance approach to all forms of SEAH, ensuring that all staff, volunteers, partners, and affiliates act with integrity, respect, and accountability to foster a culture of safety, dignity, and protection. Respect for all individuals—whether staff, volunteers, primary actors, or community members—is fundamental to safeguarding and central to building trust and ensuring that everyone feels valued and protected.

VSO is committed to upholding and maintaining the highest standards of behaviour and integrity and its commitment to safeguarding complies with the values that shape our culture.

This policy is fully aligned with international safeguarding frameworks, including:

- UN Secretary-General's Bulletin ST/SGB/2003/13 on Special Measures for Protection from Sexual Exploitation and Abuse
- IASC Six Core Principles
- CAPSEAH Minimum Standards, emphasizing survivor-centered approaches, accountability, and prevention
- **Core Humanitarian Standard (CHS)**, ensuring quality and accountability in humanitarian response
- **UN Convention on the Rights of the Child**, UN Convention on the Rights of Persons with Disabilities, CEDAW, and other relevant human rights instruments.

VSO commits to implementing these standards through training, reporting mechanisms, survivor support, and continuous monitoring and evaluation. This policy must be read in conjunction with national laws and statutory reporting obligations in the countries where VSO operates. Where national legislation mandates reporting of safeguarding concerns (e.g., child abuse, sexual violence), VSO will comply with these requirements while ensuring alignment with VSO's internal safeguarding standards. In cases where national laws are less stringent than VSO's policy, VSO's higher safeguarding standards will prevail.

VSO believes that safeguarding is everyone's responsibility and the duty to safeguard others applies without exception to anyone associated with VSO. VSO recognises that persons with disabilities are subject to multiple discrimination and are at increased risk of abuse, sexual exploitation, and sexual violence. The heightened risk means that additional measures must be considered to fully protect them and a disability inclusive safeguarding approach that proactively includes persons with disabilities must be applied. The purpose of this policy is to:

• Set out the position of VSO on the prevention of and protection from sexual exploitation, abuse, harassment and sexual violence of all kinds



• Set out responsibilities and procedures to be followed in order prevent abuse happening in the first place

Set out responsibilities and procedures to be followed where a suspicion, allegation or actual harm has happened

#### 1.2 Zero-tolerance approach

VSO maintains a zero-tolerance stance on all forms of sexual exploitation, abuse, harassment (SEAH), and sexual violence, regardless of context, intent, or severity. This applies to all employees, volunteers, and affiliated personnel.

Key principles of the policy include:

- 1. **Zero tolerance for SEAH acts** all allegations are thoroughly investigated following <u>CHS</u> guidance.
- 2. **Zero tolerance for inaction** failing to prevent, report, or respond to SEAH is considered misconduct.
- 3. **Zero tolerance for retaliation** any retaliation against survivors, whistleblowers, or witnesses will result in disciplinary action.

VSO's zero tolerance approach reflects a firm commitment to safeguarding, encouraging the reporting of all concerns—including anonymous ones—without fear of reprisal. Crucially, this does not mean that the outcome of any investigation is pre-determined; rather, all reports are subject to thorough, impartial review and consistent action, ensuring fairness, accountability, and support for those affected.

# 2. Scope

This policy applies to all VSO people; employees, volunteers, trustees, partners, consultants and contractors, employees and volunteers of sub-contractors, agency workers, and all visitors to VSO work programmes and offices. It is directly aligned with our VSO and Global Harassment, Bullying and Intimidation Prevention Policy which sets out the expectations for the behaviour of those associated with VSO which set out the expectations for the behaviour of those associated with VSO. This safeguarding policy applies to all VSO staff and affiliated personnel at all times, including during and outside of working hours, while on leave or off duty, and in both professional and personal contexts where behavior could impact VSO's reputation or the safety of others.

## 3. Definitions

- Child: a child is defined as any person under the age of 18, in accordance with the UN
  Convention on the Rights of the Child, regardless of the age of majority or consent in the
  country where the child is located.
- **Sexual Exploitation (SE):** 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. E,g, coercing individuals into engaging in sexual activities in exchange for aid, services, or other benefits.
- **Sexual Abuse (SA)**: the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. This includes sexual assault, rape, molestation, other forms of non-consensual sexual activity.
- Sexual Exploitation and Abuse (SEA) is the abuse or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes or the actual or threatened



- physical intrusion of a sexual nature by VSO personnel, their implementing partners or other aid workers, against the people they serve
- Sexual Harassment (SH): a range of unacceptable and unwelcome behaviours and practices
  of a sexual nature that may include, but are not limited to, sexual suggestions or demands,
  requests for 'sexual favours', sexual, verbal or physical conduct, or gestures that are or might
  reasonably be perceived as offensive or humiliating. This includes jokes, comments, messages
  of a sexual nature; suggestive looks, staring, leering; touching inappropriately, display of,
  circulation of pornographic material, behaviour in a work environment but can also occur in
  communities and public spaces.

Source: VSO Safeguarding Glossary – A central reference for safeguarding and PSEAH terminology.

# 4. Responsibilities

#### 4.1 All

All employees, volunteers, consultants, trustees, guests, observers, and other representatives are obliged to follow this policy and maintain an environment that prevents sexual exploitation and abuse, and which encourages reporting of breaches of this policy. All VSO representatives must declare any actual, potential, or perceived conflict of interest that may compromise their ability to act in the best interest of safeguarding. This includes personal relationships with beneficiaries, involvement in investigations, or any situation where impartiality may be questioned. Failure to disclose conflicts of interest may result in disciplinary action.

#### 4.1.1 Adult Safeguarding

All employees, volunteers, consultants, trustees, guests, observers, and anyone associated with VSO must always:

- Strive to create and maintain an environment which prevents sexual exploitation, abuse and sexual violence and harassment.
- Promote a zero-tolerance approach to all forms of abuse and exploitation. Develop relationships with all stakeholders based on equality, trust, respect, and honesty.
- Be aware of power dynamics—both physical and digital—including those shaped by gender, race, disability, sexuality, caste, ethnicity, education, or organisational role. Recognise that misuse of power and privilege is at the core of sexual exploitation, abuse, and violence.
- Immediately report any concerns, suspicions or incidents that breach this policy or the <u>Global</u> <u>Code of Conduct</u> by anyone associated with VSO.

All employees, volunteers, consultants, trustees, guests, observers, and anyone associated with VSO must never:

- Sexually harass, assault, abuse, or exploit anyone.
- Rape anyone. Exchange money for sexual activity, this includes paying for sex with a sex worker, which is a form of exploitation and applies even in countries where this is legal. VSO's safeguarding standards supersede local legal permissibility in such matters.
- Exchange employment, goods, or services for sexual favours or other forms of humiliating, degrading or exploitative behaviour. This includes any exchange of assistance that is due to beneficiaries of assistance.



- Develop or seek to develop a sexual relationship with a primary actor of any age, due to inherently unequal power dynamics.
- Physically harass, assault, or abuse another person.
- Emotionally abuse another person such as engaging in behaviour intended to shame humiliate, belittle, or degrade.
- Condone or participate in any behaviour that is abusive, discriminatory, illegal, or unsafe.
- Use any form of technology to exploit, harass or abuse another person. Access, view, create, download, or distribute indecent images including pornographic images, sexualised images of children, images of child abuse).

#### Key reminders for digital/online behaviour:

- Maintain professional boundaries in all digital communications, including emails, messaging apps, and social media.
- Avoid sharing or forwarding inappropriate content, including jokes, memes, or images that could be offensive or harmful.
- Never use personal digital platforms to initiate or pursue relationships with primary actors or beneficiaries.
- Be mindful of tone and language in online interactions—what may seem casual can be misinterpreted or cause harm.
- Report any misuse of digital platforms that may compromise safeguarding standards.

#### 4.1.2 Child Safeguarding

VSO is unequivocally committed to ensuring that no child is harmed in any way by anyone associated with our work. This includes VSO employees, volunteers, partners, stakeholders, and all affiliated personnel. VSO maintains a zero-tolerance approach to all forms of abuse, exploitation, and neglect of children and will take immediate action to prevent, report, and respond to any such incidents.

While in direct or indirect contact with children, all employees, volunteers, consultants, trustees, guests, observers, and anyone associated with VSO must always:

- Treat children with respect, value their views and take them seriously.
- Use positive, non-violent methods to support and manage behaviour.
- Maintain professional boundaries and be mindful of how language and actions may be perceived by children.
- Follow the 'two-adult' rule during activities involving children ensuring two or more adults are present and visible. Where a practitioner is working with a child with disabilities who has personal care requirements, the practitioner should work with the child and their parents or carers to discuss how the 'two adult rules' will work, document this consultation process, and collect informed consent/ assent. Exceptions must be documented and approved by safeguarding focal points.
- Immediately report any concerns about a child's welfare to the Global Safeguarding Team.

While in direct or indirect contact with children, all employees, volunteers, consultants, trustees, guests, observers, and anyone associated with VSO must never:

• Act in ways that are or may be perceived as abusive or exploitative (physically, emotionally, neglectfully, or sexually) towards children.



- Have sexual intercourse or participate in any form of sexual activity with any person under 18 years old or under the local age of sexual consent (whichever is higher). Mistaken belief in the age of the child is not a defence.
- Abuse their position of power or discriminate against children. Use physical punishment/discipline (e.g., hitting, corporal punishment).
- Use any form of technology (e.g., computers, mobile phones, digital cameras) to exploit, harass or bully children. Access, view, create, download, or distribute indecent images of children (e.g., pornographic images of children).
- Communicate with children via digital platforms (e.g., Facebook Twitter, Instagram), mobile technology (WhatsApp, Skype, texting) or online without parental/caregiver consent and knowledge.
- Fail to disclose any convictions or child related investigations that they are subject to or have been subject to.
- Agree to keep secrets with children that could affect their safety or that of others.
- Fail to report concerns relating to children.
- Condone or participate in illegal, unsafe, harmful, or abusive behaviour or activities involving children.
- Use children for errands, financial gain or solicitation.
- Use inappropriate, harassing, abusive, sexually provocative or shaming language towards children. Engage in or promote commercial exploitation of children (e.g., trafficking, child labour). Perform personal tasks for children (like dressing or toileting) that they can do themselves.
- Seek personal contact with children outside designated work activities, including visiting homes along or inviting children into private accommodations.
- Take children to their home or sleep in the same room or bed as a child.

## 4.2 Managers

As well as upholding safeguarding standards themselves, managers are responsible for providing leadership in the following areas:

- Ensuring employees, volunteers, and other representatives are aware of the safeguarding policy, receive regular safeguarding training commensurate with their role and are supported to implement and work in accordance with it.
- Leading by example and holding themselves and others accountable for safeguarding behaviours and adherence to policy.
- Supporting and developing systems that maintain an environment in which primary actors, employees, volunteers, contractors, partners, and other representatives know how VSO expects them to behave and responding appropriately when expectations are not met.
- Ensuring all stakeholders including employees, volunteers, primary actors, contractors, partners, and other associates know how they can submit complaints and report concerns.
- Setting safeguarding mitigation measures and prioritising safeguarding actions for each year.
- Ensuring adequate resources, including contingency provisions, are allocated to effectively
  implement safeguarding measures and support robust incident management in the event of
  a safeguarding incident.

#### **4.3 Safeguarding Focal Points**

The role of the Safeguarding Focal Point is to support VSO project teams to prevent and respond to allegations of sexual exploitation and abuse by receiving concerns and forwarding these to the Global



Safeguarding Team, raising awareness and promoting best practice. This is not an expert role but one that works collaboratively across the project team and VSO's safeguarding experts. In many cases, this responsibility is assigned to project delivery personnel; project implementation lead, project People Leads or members of the People team. Safeguarding is an integral part of core line responsibilities and professional remit. This ensures that safeguarding risks are proactively identified and addressed, and that appropriate mitigation measures are embedded throughout the project lifecycle. Depending on the scale and complexity of a project, it may be necessary to designate a dedicated safeguarding role within a project team.

#### Safeguarding focal points will:

- Sensitively receive complaints and refer all and any of them to the Global Safeguarding Team in line with the VSO Incident Management framework
- Collaborate with VSO safeguarding experts to promote best practice, prevention, and awareness in programmes
- Work with the Global safeguarding team to acknowledge complaints and to provide or facilitate first-line support to complainants and survivors throughout the process
- Work with the Global safeguarding team and other relevant stakeholders (eg volunteer representatives, community leaders, MEAL) to develop and maintain accessible reporting mechanisms
- Work with the Global safeguarding team to support the delivery of safeguarding training, awareness raising and other capacity building activities for project teams, volunteers and partner organisations
- Where appropriate provide support in partnership with the Safeguarding Team to facilitate safeguarding investigations

#### 4.4 Global Safeguarding Team

VSO's global safeguarding team lead, oversee, and quality assure all areas of safeguarding to ensure the mainstreaming and integration of safeguarding into VSO's global portfolio of work. They are responsible for ensuring alignment with international safeguarding standards, conducting regular policy reviews and support safeguarding audits across VSO's global operations where required. The global safeguarding team provides adequate and appropriate training opportunities, expert advice, guidance, and leadership to support effective implementation of VSO's safeguarding framework. They are responsible for the case management of incidents related to safeguarding.

#### 4.5 VSO Executive Board

The VSO executive board is responsible for ensuring the effective implementation of this policy and associated procedures and ensuring that everyone linked with VSO is equipped and supported to meet their responsibilities.

#### 4.6 Trustees

The board of trustees holds ultimate accountability for this policy. Trustees must ensure safeguarding is embedded in governance structures, receive regular safeguarding updates, and oversee risk mitigation and incident response compliance.



# 5. Child Safeguarding Principles and Values

VSO is committed to upholding the rights of children as outlined in the UN Convention on the Rights of the Child. We believe that all children have the right to be protected from harm, to be listened to, and to have their views respected. Our child safeguarding approach is grounded in the principles of non-discrimination, the best interests of the child, child participation, and accountability.

#### 5.1 Code of Conduct with Children

VSO representatives are expected to follow a strict code of conduct when interacting with children, as outlined in detail in Section 4.1.2 of this policy.

## **5.2 Child-Specific Reporting Procedures**

Any concerns or allegations related to child abuse must be reported immediately to the Global Safeguarding Team. Reports involving children will be handled with the utmost sensitivity and in accordance with child protection laws and best practices. Children must be informed of their right to be protected and how to report abuse in a child-friendly manner.

#### 5.3 Child Protection Risk Assessment

All programmes involving children must complete Safeguarding Risk Assessment and Management Tool. This assessment should identify potential risks to children and outline mitigation strategies. The assessment must be reviewed regularly and updated as necessary.

#### 5.4 Child Participation and Empowerment

VSO promotes the meaningful participation of children in decisions that affect them. Children should be empowered to express their views and contribute to programme design and evaluation in a safe and supportive environment.

## 5.5 Confidentiality and Data Protection for Children

All personal information about children must be handled with strict confidentiality. Data must be stored securely and only shared with individuals who have a legitimate need to know. Consent must be obtained from children and their guardians before collecting or sharing any personal data.

# 6. Safeguarding within the workplace

#### 6.1 Managing Workplace Harassment, Intimidation, and Bullying

VSO is committed to fostering a safe, respectful, and inclusive environment, where harassment, bullying, and intimidation are strictly prohibited under the <u>Global Harassment</u>, <u>Bullying and Intimidation Prevention Policy</u>. Concerns can be reported through the <u>Global Grievance Policy</u>, <u>Managing complaints procedure</u>, or via the <u>Whistleblowing</u> route. All reports are handled confidentially, investigated fairly, and may result in disciplinary action if misconduct is confirmed.



#### **6.2 Protecting VSO People from SEAH**

VSO prioritizes the personal safety and wellbeing of all its people—staff, volunteers, and dependents. Any form of sexual or gender-based violence against VSO personnel is treated as a serious incident.

To guide appropriate responses, VSO uses the Responding to Sexual exploitation, abuse and harassment Toolkit, which includes:

- Definitions and consequences of sexual violence including sexual exploitation, abuse and harassment
- Preventative strategies to reduce risk and build resilient teams
- Step-by-step guidance for managing disclosures and reports

#### 6.3 Strengthening safeguarding in Global Volunteer Networks

Volunteer network members are expected to uphold safeguarding and PSEAH principles by promoting respectful behaviour, protecting the dignity and safety of all individuals, and ensuring their actions do not cause harm, abuse, or exploitation. While VSO does not hold contractual obligations with members of volunteer network, any proven breach of the safeguarding policy or code of conduct may result in the termination of their voluntary engagement. Volunteers should refer concerns responsibly and confidentially. Below is the reporting pathway for members of the volunteer network:

- If a concern relates to community or child protection and VSO has no direct association, it should be reported via local community reporting mechanisms.
- If the incident involves volunteers or individuals linked to VSO, it must follow the organizational safeguarding incident reporting flowchart.
- If the survivor is a community volunteer or part of the volunteer network, they should be supported through appropriate referral systems to access appropriate protection, health, psychosocial, or legal services.

Volunteers are not responsible for investigating or managing cases but play a vital role in maintaining safe and respectful environments. VSO's responsibilities for strengthening the volunteer network include the following:

- Deliver mandatory safeguarding training tailored to local contexts, literacy levels and volunteer roles. Training should include PSEAH principles, child protection and survivorcentered approaches.
- Set clear safeguarding expectations through a code of conduct. This ensures volunteers understand behavioral standards and reporting obligations.
- Monitor safeguarding practices and gather feedback from volunteer and communities to ensure continuous improvement.

# 7. Policy application across VSO

### 7.1 Risk assessment and programme design

VSO ensures that risks of sexual exploitation, abuse and harassment are properly assessed, addressed and monitored through integrating safeguarding into its planning, programming and operational processes (e.g. designing, budgeting, start-up phase, project implementation stage) and allocates sufficient human and financial resources to implement safeguarding measures effectively. VSO conducts thorough and inclusive risk analysis and <u>assessments</u> on safeguarding including assessing the safeguarding capacity of its partner agencies, and sub-grantees while designing projects and



programme activities with mitigation measures and identifies the groups that are the most marginalised and at heightened risk of SEAH. VSO mandates a zero-tolerance policy on safeguarding, including Sexual Exploitation, Abuse, and Harassment (SEAH), for all partners, suppliers, contractors, subcontractors, and sub-partners, with this requirement embedded in all agreements. Partners lacking adequate safeguarding measures will receive support, but failure to prevent or address SEAH may lead to contract termination.

VSO will ensure that disability-inclusive and gender-sensitive safeguarding risk assessment and mitigation planning is embedded in the programme design cycle and continues to be a key reference document across the life of the programme.

#### 7.2 Safer Recruitment

VSO is committed to recruiting employees, volunteers, and other representatives safely, including mandatory disclosure of past misconduct related to safeguarding or PSEAH in line with its Global People Resourcing Policy.

All roles will be specifically evaluated for safeguarding risk to determine the level of background checking required and stated in the job description.

Offers of employee and volunteering roles are conditional depending on satisfactory background checking and no individual will begin service with VSO until all background checks have been done and returned satisfactory results.

VSO adheres to <u>the Misconduct Disclosure Scheme</u> which operates in the Humanitarian and Development sector. The Scheme has been devised to systematically prevent anyone who has been found guilty of misconduct from working in the humanitarian and development sector and moving from one employer in the sector to another.

As part of the onboarding process, all new recruits are required to complete and sign a safeguarding self-declaration form, disclosing any previous misconduct or involvement in related investigations.

## 7.3 Induction and Training

VSO includes an Introduction to Safeguarding as a mandatory annual module in the essential learning pathway of all employees, volunteers, trustees, and those associated with our work.

In addition to this mandatory module all VSO people must receive safeguarding training commensurate with their role prior to their start of service including information about VSO's policy positions, how to recognise signs and symptoms of abuse, reporting procedures and how to embed Safeguarding into VSO's work.

VSO has developed an advanced safeguarding online training module specifically for Safeguarding Focal Points and Managers. Completion of this training is mandatory and ensures that those in key safeguarding roles are equipped with the knowledge and tools to uphold VSO's safeguarding standards and respond effectively to incidents.



#### 7.4 Complaints and feedback mechanisms

VSO will inform primary actors, partners, and communities in which it works of the standard of behaviour they can expect from anyone associated with VSO and how they can raise concerns about inappropriate behaviour or provide feedback safely and confidentially. In line with CHS, CAPSEAH, and UN PSEA standards, VSO will maintain accessible, inclusive, and survivor-centred complaints mechanisms. These will be co-designed with communities to ensure cultural and linguistic relevance, and sensitivity to age, gender, and disability. Multiple channels—verbal, written, digital, anonymous, and in-person—will be available to accommodate diverse needs, including those with limited literacy or digital access. All complaints will be handled confidentially, impartially, and promptly. Survivors and complainants will be treated with dignity and their safety prioritized. Feedback loops will inform communities of actions taken, while maintaining confidentiality.

#### 7.5 Reporting and Responding to Safeguarding Concerns Including SEAH

#### 7.5.1 Mandatory Reporting

VSO places a mandatory obligation on all employees, volunteers, interns, consultants, partner agencies, sub-grantees, and visitors to our projects to immediately report concerns, suspicions, allegations, and incidents which indicate actual or potential abuse of any kind, sexual violence including sexual harassment, sexual exploitation or any behaviour which suggests this policy may have been breached. It is not the responsibility of the person reporting the concern to decide whether abuse has taken place. The responsibility is to report so that the procedure for dealing with suspected or actual incidents of abuse can be initiated.

Concerns can be raised with an individual's line manager, project implementation lead or country lead, project safeguarding focal point or directly to the global safeguarding team.

If the person feels uncomfortable reporting through any of the above reporting lines, they can report directly to:

VSO Global Safeguarding Team: safeguarding@vsoint.org

Or

VSO Whistleblowing: whistleblowing@vsoint.org

The policy allows for the submission of anonymous reports through the specified email addresses, ensuring confidentiality and accessibility for all reporters.

Reported breaches of this policy will be kept confidential and information shared only with relevant individuals on need-to-know basis. All reports made in good faith, even if not substantiated, will be treated with respect and confidentiality. VSO will do all it can to protect individuals who report misconduct from any form of retaliation, discrimination, or disadvantage and ensure their safety throughout the process. This responsibility applies across all levels of the organization and will be enforced through disciplinary procedures. Knowingly making false allegations is a serious breach of this policy and will be subject to disciplinary action. VSO distinguishes between malicious reporting and good faith reporting that may not be substantiated.

Donors will be informed where there is a mandate to do so, and VSO will report serious incidents to the Charity Commission for England and Wales (statutory bodies in other countries may be informed where there is an obligation to do so). All names and any identifying information will be redacted, and strict confidentiality protocols will be adhered to.



#### 7.5.2 Incident Response

VSO takes all concerns and reports of abuse seriously and will take immediate, confidential and survivor-centred action in line with international PSEAH standards. All concerns, suspicions and incidents must be reported to VSO's Global Safeguarding Team and responded to in line with the VSO Incident Management Framework. In responding to an incident of abuse, sexual exploitation or sexual violence VSO will take a survivor centred approach. A survivor-centred approach aims to ensure that anyone who has been the target of abuse, sexual exploitation or sexual violence is treated with dignity and respect and that the person's rights, privacy, needs, and wishes are respected. A survivor-centered approach includes:

- Ensuring informed consent and confidentiality.
- Providing access to psychosocial, medical, and legal support through established referral pathways.
- Collaborating with local service providers to ensure timely and appropriate care
- Ensuring survivors are not retraumatized during investigations or follow-up processes.

VSO's response will be guided by the Responding to sexual exploitation, abuse and harassment Toolkit. Every effort must be made to maintain confidentiality throughout the incident response process and beyond by all VSO people. VSO employees and volunteers who breach confidentiality will be subject to disciplinary action up to and including termination of employment.

## 7.5.3 Investigation of SEAH Allegations

VSO has a formal process for investigating Sexual Exploitation, Abuse, and Harassment (SEAH) allegations involving its staff or associated personnel. Investigations are conducted promptly and appropriately, or referred to the relevant investigative body if the accused is affiliated with another organization. These procedures are outlined in a separate document based on CHS Investigation Guidelines.

If an allegation is substantiated, the case may be referred to national authorities for further action, including criminal prosecution—only with the survivor's informed and voluntary consent. In exceptional circumstances, and only after a thorough risk assessment that considers the survivor's safety, dignity, and well-being, VSO may report the case without consent, in line with applicable laws and international safeguarding standards.

#### 7.5.4 Impartiality and Risk Assessment During Investigations

When a safeguarding concern is raised, both the survivor and the subject of complaint must be treated impartially and with dignity. No discrimination or prejudgment shall occur during the investigation process. A safeguarding investigation risk assessment will be conducted to identify and mitigate risks to both parties. This ensures appropriate support is provided to facilitate cooperation with investigators and to enable the subject of complaint to reintegrate into the workplace if the allegation is not substantiated. This approach is aligned with international standards including CHS and PSEAH.

## 7.5.5 Learning from safeguarding incidents

VSO is committed to continuous learning and improvement. All safeguarding incidents will be reviewed to identify systemic gaps, inform policy updates, and strengthen prevention strategies. Lessons learned will be documented and shared across teams while maintaining confidentiality and survivor protection.



#### 7.6 Survivors Assistance and Support Commitment

VSO is committed to ensuring that all victims of Sexual Exploitation, Abuse and Harassment (SEAH) receive timely assistance and support as soon as an allegation is reported—regardless of whether an investigation is initiated, its outcome, or the survivor's participation in any accountability process. Support is provided by qualified service providers following a "do no harm" and survivorcentered approach, respecting the rights, dignity, and best interests of survivor. Services are rights-based, age-, gender-, and disability-sensitive, non-discriminatory, and culturally appropriate. Support includes:

- Safety measures to prevent retaliation
- Access to medical care, dignity kits, psychosocial and legal support, basic material aid, and support for children born from SEA

To ensure effective support, VSO has:

- A current list of local service providers, aligned with inter-agency GBV/Child Protection <u>service</u> <u>mapping</u>.
- Standard Operating Procedures (SOPs) for referrals and survivor support, including confidentiality and information-sharing protocols.
- <u>Referral forms</u> to guide and document support processes.

#### 7.7 Communications, Storytelling, and social media

VSO takes care to ensure that in all forms of communication primary actors are treated with respect, portrayed with dignity, and not put at risk as a result of their contact with VSO. Text, photographs, or video images should never be used in a way that may put a primary actor at risk of harm and risk assessment is an essential stage of any content gathering. Images should never include partially clothed or naked subjects and should not in any way be sexually provocative, demeaning or culturally inappropriate.

VSO people and associates, including partners, must not capture any images, videos, or other media of primary actors and other stakeholders without prior informed consent, and must not post any such content on social media platforms without explicit permission. Primary actors who are invited to be the subject of text, photograph or video resource gathering should be provided with accessible information about how their story or image will be used to enable them to make an informed decision about consent. Consent must be documented and include an explanation of how the content will be used, stored, and shared. Consent is only meaningful if it can be freely given and informed by a clear understanding of the context and usage of material.

All content gathering must follow VSO's consent form and guidance protocols. VSO employees, volunteers and other representatives should adhere to VSO's <u>Social Media Policy</u> when engaging in any social networking activity which includes both personal accounts as well as VSO branded social channels.

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