

# **RSPN Beneficiaries Safeguarding Policy**

## **1. Introduction**

The Rural Support Programmes Network (RSPN) consists of nine member Rural Support Programmes (RSPs) that espouse a common approach to rural development: social mobilisation. RSPN works closely with government, donors and communities to promote the RSP approach to community driven development that has significant pro-poor impacts.

RSPN commonly reaches out to beneficiaries indirectly i.e. after contracting RSP(s). However, this does not preclude RSPN from working directly with communities. Safeguarding the beneficiaries RSPN and partner RSPs (contracted by RSPN for projects) work with is foundational to all RSPN activities and programmes.

RSPN is committed to respecting the dignity and rights of all its employees and beneficiaries, safeguarding them against bullying, harassment, sexual exploitation & abuse and offering a safe and trusted work environment where employees and beneficiaries have the confidence to approach the organisation if they encounter such issues.

Safeguarding of RSPN employees is covered under various policies included in the RSPN Human Resources Policies and Procedures Manual, namely the Whistleblowing Policy, the Grievance Redressal Policy, the Gender Policy including the Code of Conduct on Zero Tolerance for Sexual Harassment. Adoption and implementation of this Code of Conduct makes RSPN fully compliant with the Protection Against Harassment of Women at Workplace Act 2010.

RSPN has developed this Beneficiaries Safeguarding Policy for safeguarding its beneficiaries against any harm from RSPN employees. RSPN expects that the implementation of this policy will lead to a safer and trusted environment for its beneficiaries.

## **2. Purpose of the Policy**

The purpose of the RSPN Beneficiaries Safeguarding Policy is:

To protect and safeguard beneficiaries, particularly women, children and vulnerable adults, who come in contact with RSPN employees against exploitation, sexual harassment and abuse, bullying and child abuse.

To provide employees (as defined in section 4. viii), especially those working directly or indirectly with beneficiaries, with overarching principles and clear systems of recourse that guide RSPN's approach to beneficiaries safeguarding.

### **3. Policy Administration**

#### **3.1. Approval and Amendments**

This policy and any amendments to it shall be approved by the Board of Directors (BOD) of RSPN.

#### **3.2. Responsibility for Implementation**

CEO RSPN shall be responsible for the overall implementation of and ensuring compliance with this policy. Operationally, the head of RSPN's Gender and Development (GAD) Section and the Beneficiaries' Safeguarding Committee at RSPN will be responsible for its implementation.

#### **3.3. Custody, Clarification and Improvements**

Manager Gender & Development (GAD) / Head of Gender and Development Section shall be the custodian of the Policy. Requests for clarification or explanation of this policy shall be addressed to the Manager GAD RSPN.

It shall be the responsibility of the Manager GAD to ensure that the Policy is regularly updated to meet the changing needs of the organisation and/or changes in best practices or applicable laws.

Requests for an amendment to the Policy can come from any source, e.g. from beneficiaries, RSPN employees, partner organisations, donors etc. A safeguarding incident may also necessitate a change to the Policy.

Once an amendment request is approved, the change must be communicated to all the users of the Policy, together with the effective date of implementation, inter-alia holders must be given a copy of the revised Policy.

### **4. Definitions**

- i. Beneficiaries Safeguarding Committee:** Beneficiaries Safeguarding Committee is the inquiry committee constituted under section 11 of this Policy.
- ii. Beneficiary:** Any person who directly receives a tangible product or service at no or subsidised cost from RSPN, is selected for participation in an RSPN sponsored programme or event or otherwise interacts directly with RSPN employee(s) in connection with an RSPN programme or activity, such as a person accompanying a family member to a training, event etc. However, a person only hearing, seeing or using

RSPN's public broadcasts available to the general public, such as social media, television, radio, billboard, poster or presentations, shall not be considered a beneficiary under this definition.

- iii. **Bullying:** Bullying is an ongoing and deliberate misuse of power in relationships through repeated verbal (e.g. racist/caste-based remarks, threats, name calling), physical (e.g. hitting, kicking, snatching) and/or social behaviour (e.g. isolating an individual from the activities and social acceptance of their peer group) that intends to cause physical, social and/or psychological harm. It can involve an individual or a group misusing their power, or perceived power, over one or more persons who feel unable to stop it from happening.
- iv. **Child:** Any person less than eighteen years of age.
- v. **Child Abuse:** All forms of physical abuse, emotional ill-treatment, sexual abuse and exploitation, neglect or negligent treatment, commercial or other exploitation of a child, including any actions that result in actual or potential harm to a child, or threaten to damage a child's prospect of safe and healthy development into adulthood. Such actions may include but are not limited to activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.
- vi. **Complainant:** Complainant means a beneficiary or, in case of a child, the parent/guardian of the beneficiary, who has made a complaint under this Policy to the Designated Safeguarding Officer on being aggrieved by an act of exploitation, sexual harassment, sexual abuse, bullying or child abuse.
- vii. **Designated Safeguarding Officer:** Designated Safeguarding Officer means an employee designated as the Safeguarding Officer under section 9 of this Policy.
- viii. **Employee:** An employee means a regular, contractual, daily wage or part-time employee, intern, consultant, volunteer or any other representative of RSPN including members, directors and advisors of RSPN.
- ix. **Exploitation:** The actual or attempted abuse of a position of vulnerability, power differential or trust of a person for sexual gratification or monetary, social or political benefit of another.
- x. **Implementing Partner:** For the purpose of this policy, an implementing partner means any entity engaged by RSPN for the purpose of undertaking an activity or subcontracted for implementing a part of RSPN project. Implementing partners include but are not limited to RSPs, external partners and consulting firms.

- xi. **Sexual Abuse:** The actual or threatened physical intrusion of a sexual nature, forced upon a woman, man, transgender or child, without their consent whether by force or under unequal or coercive conditions, including but not limited to attempted rape and inappropriate touching.
- xii. **Sexual Harassment:** Any unwelcome sexual advance, request for sexual favors or other verbal/written communication, physical conduct of a sexual nature or sexually demeaning attitudes creating an intimidating, hostile or offensive environment.
- xiii. **Survivor/Victim:** means a person who is, or has been, sexually exploited or abused.
- xiv. **Vulnerable Adult:** Any person aged 18 years or above who is susceptible to abuse or exploitation due to mental or physical disability, age, health, sex, religion, ethnicity or economic status.

## 5. Policy Statement

- a. RSPN has a zero-tolerance policy for child abuse, sexual harassment and abuse, bullying and exploitation of beneficiaries by RSPN employees.
- b. RSPN employees, especially those interacting directly or indirectly with beneficiaries, must always act with integrity and in the best interest of the beneficiaries.
- c. RSPN employees are obliged to create and maintain an environment that prevents exploitation, sexual harassment and abuse of beneficiaries.
- d. RSPN employees, except in case of a legal relationship, shall be prohibited from having sexual relationships with beneficiaries, regardless of age or consent of the parties.
- e. RSPN shall ensure that staff recruited are suitable to work with beneficiaries, especially women, children and vulnerable adults.
- f. RSPN employees shall not engage in sexually inappropriate behaviour with children, including, but not limited to, sexual abuse, touching a child in a culturally inappropriate manner or participating directly or indirectly in creating or promoting child pornography or making pornography or other sexually inappropriate materials available to a child.
- g. Exploitation and abuse (sexual, physical, verbal or emotional) of adults or children by RSPN employees shall constitute acts of gross misconduct and will result in disciplinary action (defined in section 14.g. of this policy), up to and including termination from employment.
- h. RSPN encourages its employees and others who have information about incidents of inappropriate behaviour by employees of RSPN or its implementing partners in breach

or suspected breach of this policy, to come forward and express their concerns without fear of unfair treatment or other consequences.

- i. RSPN employees shall cooperate fully with any inquiries and/or investigations under this policy.

## **6. Guiding Principles**

This policy is based on the following principles:

- a. Beneficiaries that come into contact with RSPN and its employees have the right to be treated with respect, dignity, and courtesy, and to have access to RSPN programmes and activities on a non-discriminatory, fair and transparent basis;
- b. RSPN employees shall not discriminate against beneficiaries on the basis of race, colour, religion, gender, age, sexual orientation, ethnicity or other group association, political affiliation, education, marital or parental status, pregnancy or disability; and
- c. Safeguarding of beneficiaries shall be an inherent part of the design and implementation of all RSPN projects and programmes.

## **7. Expected Behavior of RSPN Employees:**

7.1. When working with beneficiaries, RSPN employees must ALWAYS:

- a. Behave appropriately and be sensitive about the language being used;
- b. Refrain from jokes or comments that may cause discomfort or offence;
- c. Be sensitive to local norms;
- d. Avoid inappropriate physical contact with beneficiaries particularly with women, children or vulnerable adults;
- e. Work with children or vulnerable adults in the presence of other adult(s); and
- f. Immediately report any concerns related to the safety or welfare of beneficiaries.

7.2. When working with beneficiaries, RSPN employees must NEVER:

- a. Hit or otherwise physically assault, harm or abuse them;
- b. Develop physical/sexual relationships with them;

- c. Develop relationships with them that could in any way be deemed exploitative or abusive;
- d. Behave verbally or physically in a manner that is inappropriate or sexually provocative;
- e. Act in ways intended to shame, humiliate, belittle or degrade beneficiaries, or otherwise perpetrate any form of emotional abuse, discriminate against, show differential treatment, or favour particular beneficiaries to the exclusion of others;
- f. Allow allegations made by beneficiaries or concerns expressed by others about their welfare, to go unrecorded or not acted upon; and
- g. Use cell phones or other electronic devices to view, download, distribute or create indecent or inappropriate images of the beneficiaries;

**8. Implementation of the Policy:**

- a. RSPN employees shall be provided a copy of and training on the RSPN Beneficiaries Safeguarding Policy.
- b. Newly recruited RSPN staff shall be oriented on the RSPN Beneficiaries Safeguarding Policy.
- c. The RSPN Beneficiaries Safeguarding Policy shall be made part of all Consultant contracts.
- d. RSPN employees involved in the recruitment for positions that entail direct or indirect interaction with beneficiaries must take all appropriate precautions to gauge a candidate's suitability to work with beneficiaries, especially women, children and vulnerable adults. This may include, but is not limited to, reference checks and interview questions designed to elicit the necessary information.
- e. All RSPN employees shall be required to sign the Beneficiaries Safeguarding Declaration (Annex – I)
- f. For the awareness of the RSPN / implementing partner staff recruited for projects, a session on RSPN Beneficiaries Safeguarding Policy shall be made part of project orientation workshops for all projects undertaken by RSPN.
- g. For the awareness of the beneficiaries, an orientation on the RSPN Beneficiaries Safeguarding Policy shall be arranged for communities that RSPN/partner RSP works with. Handouts containing information about this policy shall be distributed at the orientation session.

- h. Policy extracts/posters containing information about this policy shall be displayed, in locally understood languages, in prominent places of the offices of RSPN, implementing partners and community institutions.
- i. RSPN shall ensure that all its implementing partners shall either have their own beneficiaries safeguarding policy or follow RSPN Beneficiaries Safeguarding Policy.
- j. Compliance with RSPN Beneficiaries Safeguarding Policy shall be an essential part of the project agreements between RSPN and implementing partners. Where the implementing partners have their own beneficiaries safeguarding policy, they may follow their own policies provided that their policies cover all the requirements of RSPN Beneficiaries Safeguarding Policy.

#### **9. Designated Safeguarding Officer**

Manager/In-charge of the Gender & Development Section at RSPN shall be the Designated Safeguarding Officer for the purpose of this Policy. CEO RSPN shall have the authority to designate any other employee as the Safeguarding Officer.

#### **10. Responsibilities of the Designated Safeguarding Officer**

- a. Act as the focal person for handling complaints under the RSPN Beneficiaries Safeguarding Policy;
- b. Acknowledge receipt of complaints to the complainants and forward the complaints to the RSPN Beneficiaries Safeguarding Committee (defined in section 11) in a timely manner;
- c. Coordinate meetings of the RSPN Beneficiaries Safeguarding Committee and facilitate the Committee in investigations;
- d. Coordinate with and provide feedback to the complainant and the accused as appropriate;
- e. Coordinate with implementing partners for complaints relating to their employees;
- f. Ensure that all complaints, investigations and decisions of the RSPN Beneficiaries Safeguarding Committee are adequately documented and kept confidential;
- g. Maintain the Beneficiaries Safeguarding Complaint Register as per the format (Annex – II) prescribed in the RSPN Beneficiaries Safeguarding Policy; and
- h. Any other responsibility assigned by the RSPN Beneficiaries Safeguarding Committee.

## **11. RSPN Beneficiaries Safeguarding Committee**

- a. The RSPN Beneficiaries Safeguarding Committee shall comprise the following members:
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| 1. | Chief Operating Officer                | Chairperson                            |
| 2. | Manager Gender & Development           | Member/Designated Safeguarding Officer |
| 3. | Specialist Social Mobilisation         | Member                                 |
| 4. | Chief Financial Officer                | Member                                 |
| 5. | Manager Human Resources/Administration | Member                                 |
- b. At least one member of the Beneficiaries Safeguarding Committee shall be a woman. The quorum for a meeting of the RSPN Beneficiaries Safeguarding Committee shall be the Chairperson and two other members, one of whom should be a woman. CEO RSPN shall have the authority to nominate additional or alternate members on a case to case basis.
- c. In case of a complaint against a member of the RSPN Beneficiaries Safeguarding Committee, CEO RSPN shall nominate an alternate member in his/her place.
- d. If any complaint is filed against the CEO, Member, Director or Advisor to the Board of RSPN, the case shall be resolved by a Committee of the Board as may be designated by the Board on a case to case basis.
- e. All members of the Beneficiaries Safeguarding Committee shall be provided appropriate training for handling and investigating cases under this policy.

## **12. Terms of Reference of the RSPN Beneficiaries Safeguarding Committee**

The RSPN Beneficiaries Safeguarding Committee shall be responsible to:

- a. Ensure that all Board members, staff, interns, consultants and volunteers are oriented on the RSPN Beneficiaries Safeguarding Policy;
- b. Review and screen complaints to assess the type and nature of the complaints and recommend appropriate course of action;
- c. Conduct inquiries / investigations on the complaints and share findings and recommendations with the CEO RSPN;
- d. Recommend penalties and/or disciplinary actions, as appropriate;
- e. For complaints relating to employees of the implementing partners, follow up with the implementing partners as to the progress of inquiry/investigation, review the



recommendations made and the decision taken by the implementing partners and give appropriate suggestions/recommendations, if any.

### **13. Reporting and Inquiry Mechanism**

- a. The complainant shall report an instances of exploitation, sexual harassment and abuse, bullying or child abuse to the Designated Safeguarding Officer. In case of anonymous complaints, the RSPN Beneficiaries Safeguarding Committee will determine whether the complaint merits an investigation.
- b. Complaints shall be submitted to the Designated Safeguarding Officer at the below email address:

[dso@rspn.org.pk](mailto:dso@rspn.org.pk).

Written complaints may also be sent at the address below:

Designated Safeguarding Officer  
Rural Support Programmes Network (RSPN)  
3<sup>rd</sup> Floor, IRM Complex  
Plot # 7, Sunrise Avenue (off Park Road)  
Near COMSATS University, Islamabad.

- c. All complaints received by the Designated Safeguarding Officer shall be shared with the Beneficiaries Safeguarding Committee within three (03) days of the receipt.

### **14. Formal Inquiry Procedure**

- a. The Beneficiaries Safeguarding Committee after the receipt of a written complaint, shall:
  - i. within three days communicate in writing the charges and statement of allegations to the accused;
  - ii. require the accused, within seven days from the day the charge is communicated to him/her, to submit a written defense and on his/her failure to do so, without reasonable cause, the Committee may proceed ex-parte;
  - iii. enquire into the charge and may examine such oral or documentary evidence in support of the charge or defense of the accused as the Committee may consider appropriate.
- b. As part of the inquiry procedure, the Beneficiaries Safeguarding Committee may:
  - i. call and/or interrogate any person in relation to the complaint;

- ii. require the production of any evidence;
- iii. record evidence;
- iv. get the complainant or the accused medically examined by an authorised doctor, if necessary.
- c. The statements and other evidences acquired in the inquiry process shall be considered as confidential. The Beneficiaries Safeguarding Committee can instruct to treat the whole proceedings confidentially, if necessary.
- d. The Complainant shall have the right to be accompanied by a family member or any other person when required to appear before the Beneficiaries Safeguarding Committee;
- e. The Beneficiaries Safeguarding Committee shall ensure that the accused does not create a hostile environment for the complainant and/or witnesses, if any, so as to pressurize him/her from freely pursuing his/her complaint;
- f. The Beneficiaries Safeguarding Committee shall, within thirty (30) days of the initiation of inquiry, submit its findings and recommendations, along with reasons thereof, in writing to the CEO RSPN.
- g. If the Beneficiaries Safeguarding Committee finds the accused to be guilty, it may, depending on the gravity of offence, recommend imposition of one or more penalties, including but not limited to:
  - i. Reprimand;
  - ii. Stoppage of increment or withholding of promotion for a specified period;
  - iii. Recovery from pay of the whole or part of any pecuniary loss caused to the beneficiary and/or RSPN by the employee;
  - iv. Reduction to a lower stage of pay in his/her grade, or to a lower grade or post; and
  - v. Termination of service without severance pay and other benefits.
- h. CEO RSPN shall make the final decision on the complaint in light of findings and recommendations of the Beneficiaries Safeguarding Committee. The final decision shall be made and implemented within seven (07) days of the receipt of recommendations from the Beneficiaries Safeguarding Committee.

## **15. Referrals**

RSPN shall provide appropriate assistance to survivors (of sexual exploitation and abuse) perpetrated by its employees, by referring them to relevant service providers (e.g. psycho-social, medical, legal), subject to the consent of the survivor.

## **16. Follow up with the Complainant**

- a. After the final decision is implemented, the Designated Safeguarding Officer shall, within one month of the implementation of the final decision, follow up with Complainant for any retaliation by the accused.
- b. In case retaliation is reported by the complainant, the Designated Safeguarding Officer shall communicate the matter to the Beneficiaries Safeguarding Committee.
- c. The Beneficiaries Safeguarding Committee shall take appropriate steps to address the matter. This may include recommendation to revise the previous decision.
- d. In case of a satisfactory follow up, the case shall be officially closed.

## **17. Mala Fide accusation**

The Beneficiaries Safeguarding Committee may recommend appropriate action against the complainant if allegations leveled against the accused are found to be false and made with mala fide intentions.

## **18. Complaint Against Implementing Partner's Employee**

- a. All complaints against employees of implementing partners shall be inquired and resolved by the Beneficiaries Safeguarding Committee of the implementing partner.
- b. When an implementing partner receives a complaint against its employee, a copy of the complaint shall be shared with RSPN for information within five (05) days of receipt of the complaint.
- c. The Beneficiaries Safeguarding Committee of the implementing partner shall inquire the complaint and make recommendations and the implementing partner's competent authority shall take a decision, as appropriate within thirty (30) days of the initiation of the inquiry.
- d. The recommendations made and the decision taken shall be communicated to RSPN before the implementation of the decision.

- e. RSPN shall review the recommendations made and the decision taken and may give appropriate suggestions/recommendations.
- f. The implementing partner shall implement the final decision as amended after taking into account RSPN's suggestions/recommendations, if any.
- g. The implementing partner shall share evidence of implementation of the decision with RSPN.

**19. Complaint Against RSPN Employee received by Implementing Partner**

If the implementing partner receives a complaint against an employee of RSPN, the implementing partner shall, within three (03) days of the receipt of the complaint, forward it to RSPN for inquiry and resolution. In such a case, the implementing partner shall also appropriately inform the beneficiary that the complaint is being handled by RSPN.

**20. Complaint Against an Employee of the Implementing Partner received by RSPN**

If the RSPN receives a complaint against an employee of its implementing partner, RSPN shall, within three (03) days of the receipt of the complaint, forward it to the implementing partner for inquiry and resolution. In such a case, the RSPN shall also appropriately inform the beneficiary that the complaint is being handled by the implementing partner.

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## **Annex – I: Declaration**

I \_\_\_\_\_ fully understand and agree to abide by the RSPN Beneficiaries Safeguarding Policy. I understand that any breaches of the Policy will be reported and appropriate action will be taken in accordance with the Policy. I also agree that, if I come across incidences of inappropriate behaviour by RSPN employees in breach or suspected breach of this policy, I will immediately report such incidences to the RSPN Designated Safeguarding Officer. Moreover, I will fully cooperate with any inquiries and/or investigations under this policy.

In addition, I confirm that I have never been involved in any incident that contravenes the RSPN Beneficiaries Safeguarding Policy.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

## **Annex – II: Beneficiaries Safeguarding Complaint Register**

The Beneficiaries Safeguarding Complaint Register shall, at a minimum, contain the following particulars:

1. Complaint No.
2. Date of Complaint
3. Details of Complainant (Name, CNIC, Address, Contact Number)
4. Sex of complainant
5. Details of Accused (Name, Designation and Project)
6. Summary of Complaint
7. Findings of the inquiry
8. Recommendations made by the Beneficiaries Safeguarding Committee
9. Final decision on the Complaint
10. Date of implementation of the final decision
11. Date(s) of follow up with the Complainant to check for any retaliation
12. Summary of follow up
13. Date of case closure