

GLOBAL POLICY

SAFEGUARDING

SAY YES! TO KEEPING CHILDREN AND PROGRAMME PARTICIPANTS SAFE AND PROTECTED

Lead	Global Safeguarding and PSHEA Unit
Version Number	Final
Date of Approval by Members' Assembly	November 2022
Effective Date (if different from above)	November 2022
Review Date (5 years from Effective or Amendment Date)	November 2027
Related Policies	PII Preventing Sexual Harassment, Exploitation and Abuse (PSHEA) Policy Global Policy on Values Conduct and Whistleblowing Global Policy on Gender Equality and Inclusion Global Data Privacy Policy Harassment, Bullying and Discrimination Policy (PII Policy) Grievance Policy (PII Policy) Disciplinary Policy (PII Policy) Whistleblowing Policy (PII Policy) PII Code of Conduct

APPLICATION

As a Global Policy, this policy applies to:

- a. Plan International, Inc. (“PII”), including its Global Hub in the United Kingdom (operating through its UK subsidiary, Plan Limited), and all of its country offices, regional hubs, liaison offices, and any other offices, some of which operate as branches and some as subsidiaries;
- b. All National Organisations¹ that have signed a Members’ Agreement and License Agreement with PII; and
- c. All other entities that agree to be bound by the Global Policies.

(together, “Plan International Entities”, or may be referred to as “we” or “us” in this document).

The Policy applies to all staff² (regardless of nature and terms of association or contract), associates³ and visitors⁴ who must comply with its requirements, including requirement to report, and understand the sanctions that may be applied for breaches of this Policy. In line with the Global Policy on Values, Conduct and Whistleblowing, which includes the Code of Conduct this policy is binding for staff both in and outside of working hours and in all aspects of a staff member’s life.

Each of the Plan International Entities, including PII, shall enact their own procedures, regulations or other regulatory documents that enable compliance by its staff (and/or, when appropriate, contractors and other partners) with this Global Policy. Where required by local law or practices, PII offices and National Organisations may enhance the standards and requirements set out in this policy.

Under this policy, any concerned child⁵, adult and/or member of a community where Plan International works has the right to report any concerns, allegations or suspicions or raise a complaint via the appropriate and available reporting procedures.

Reach

The protective scope of this Global Policy covers:

- all children, those aged under 18, regardless of their association with Plan International or our programmes/projects; and
- any child or adult who is the target of, or who we know will be immediately affected by, one or more Plan International associated projects or initiative outputs, hereafter referred to as programme participant⁶. While we are a child-focused organisation our work reaches and involves programme participants of all ages, as such we have a responsibility to safeguard these programme participants, irrespective of their age⁷.

Violence⁸ against any child or programme participant is against, not only the values and principles we uphold as described in this Global Policy, but also in direct opposition to the aims of our work. It is therefore imperative

¹ A legal entity that has signed a Members’ Agreement and License Agreement with PII. Please see Appendix 1 for the full definition.

² Individuals who receive a regular salary for work in any Plan International Entity as well as individuals paid by or through a Plan International Entity but located in another entity. Please see Appendix 1 for the full definition of Staff.

³ A range of contracted paid and non-paid individuals who have committed to work with or support a Plan International Entity. It includes, among others, board members, volunteers (including community volunteers), interns, sponsors, researchers, donors, consultants and contractors, staff and/or representatives of partner organisations and local governments (when operating in partnership agreement with a Plan International Entity). Please see Appendix 1 for the full definition of Associate.

⁴ A range of persons who are visiting our offices or programmes/projects and may come into contact with children and young people through a Plan International Entity. A visitor may be a journalist, media, researcher, visiting sponsor or celebrity. Please see Appendix 1 for the full definition.

⁵ Any person – girl, boy, young woman, young man, and children of other gender identities - under the age of 18 years (UNCRC Article 1). Please see Appendix 1 for the full definition of Visitor.

⁶ Any child or adult that is the target of, and that we know will be immediately affected by, one or more project or initiative output; irrespective of whether these are delivered directly by Plan International or by partners or organisations who are acting on behalf of Plan International. Please see Appendix 1 for the full definition of Programme Participant.

⁷ We recognise that our programmes/projects may reach participants who are over 18 years. While these programme participants are adults and may not require distinct consideration, as with children, they still require protection from violence and we retain a duty of care towards them. “Young Person/People” or “Youth” in line with United Nations definitions, include individuals – young women, young men, and young persons of other gender identities - aged 15 years to 24 years old. This group spans the categories of ‘children’, ‘adolescents’ and ‘adults.’ We recognise that the young people we work with have particular safeguarding needs requiring distinct consideration.

⁸ Violence is used throughout this policy to describe all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, emotional ill-treatment or psychological violence, sexual abuse and exploitation, harassment, and commercial or other exploitation. Violence consists of anything that individuals, groups, institutions or organisations do or fail to do, intentionally or unintentionally, which either results in, or has a high likelihood of resulting in, actual or potential harm to a child, young person or adult’s wellbeing, dignity, survival and/or development. Please see Appendix 1 for the full definition of Violence.

to our mandate to ensure that children and programme participants do not experience harm⁹, abuse¹⁰, exploitation, or any other form of violence because of their engagement with us or our programmes/projects, events, and processes. Where children who are not programme participants experience violence in the communities, they will be referred to the appropriate authorities, support services and/or absorbed into our protection and other programming interventions as appropriate/needed/can be done.

Safeguarding includes the responsibilities; preventative, responsive and referral measures that we undertake to protect children and programme participants. For us, safeguarding includes protection from sexual harassment, exploitation, and abuse (PSHEA). This Global Policy should be read in conjunction with our PII Policy on PSHEA which provides our clear and explicit stance on PSHEA of children and programme participants and our commitment to preventing SHEA amongst staff. When reading this Global Policy, it should be understood that when we use the term 'safeguarding' this includes the protection of children and programme participants from all forms of sexual violence.

We acknowledge the need to consider gender, intersectionality¹¹ and varying social identities thoroughly while implementing this Global Policy. We must ensure that our safeguarding¹² approach and response to safeguarding concerns uphold a gender and intersectional lens. Gender Responsive Intersectional Safeguarding¹³ is an approach that takes full account of an individual's gender and overlapping social identities and experiences to understand the complexity of the prejudice and/or inequality they face, or conversely, how this may lead to heightened privilege. We use this understanding to identify and respond to an individual's specific safeguarding needs. Our risk assessments; project and programme designs; and safeguarding measures must fully consider and be aware of cultural/societal norms and all intersecting vulnerabilities¹⁴. See Appendix 2 for more information on intersectionality.

PURPOSE

Plan International recognises that violence is prevalent throughout the world and in all societies. Furthermore, children and adults may be vulnerable and at greater risk of violence due to their intersecting identities, for example, due to their gender, sexual orientation, ethnic origin, disability, age or illness.

The purpose of the policy is to ensure:

- all staff, associates and visitors understand the importance of preventing violence in all its forms and their responsibility to ensure that they, their behaviour and work does not result in violence or harm against a child or programme participant.
- all staff, associates and visitors understand their role in preventing violence and harm as well as the consequences of breaching this policy.
- all staff, associates and visitors understand their responsibility to report any concerns relating to violence and harm and have access to clear guidelines on how to report suspected breaches of this policy.
- all staff, associates and visitors understand our commitment to upholding the highest level of personal and professional conduct amongst staff, associates and visitors working in or visiting programming contexts, particularly humanitarian settings where vulnerabilities are increased, ensuring zero tolerance to inaction on reports of any and all safeguarding concerns.
- children and programme participants are aware of our responsibilities to prevent and respond to any harm against them arising from actions and behaviours of our staff, associates and visitors and the routes for reporting such incidents.

⁹ Any intended or unintended detrimental effect on a child's or young person's physical, psychological, or emotional wellbeing. Please see Appendix 1 for the full definition of Harm.

¹⁰ Includes all forms of physical or mental violence, injury or violence, neglect or negligent treatment, emotional ill-treatment or psychological violence, sexual abuse and exploitation, harassment, and commercial or other exploitation. Appendix 1 for the full definition of Abuse.

¹¹ Intersectionality is a theoretical framework for understanding how aspects of a person's social and political identities (e.g., gender, sex, race, class, sexuality, religion, disability, physical appearance, programme participant, etc.) intersect, overlap, and compound to create interdependent forms of discrimination and privilege. Please see Appendix 1 for full definition of Intersectionality. You can also see Appendix 2 for more information.

¹² The responsibilities, preventative, responsive and referral measures that we undertake to protect children and programme participants, ensuring that no child or programme participant is subject to any form of harm as a result of their association with the organisation. Please see Appendix 1 for full definition of Safeguarding.

¹³ Please see Appendix 1 for full definition of Gender Responsive Intersectional Safeguarding.

¹⁴ A person's ability, which is limited by their social and political identities to avoid, resist, cope with or recover from violence, exploitation, and abuse. See Appendix 1 for full definition.

POLICY STATEMENT

We are fully committed to:

- *Creating a safe and inclusive culture that allows children, programme participants, staff, associates and visitors to thrive and feel secure while engaging with Plan International; and supports people to understand, exercise their rights and report any concerns. We promote the active involvement of children and programme participants in their own protection.*
- *Addressing the drivers of gender inequality and unequal power relations that can lead to harm and violence, including sexual harassment¹⁵, sexual exploitation¹⁶ and sexual abuse¹⁷ (SHEA) through gender responsive intersectional safeguarding of all children and programme participants from all forms of violence by staff, associates and visitors.*
- *Strengthening, cultivating and sharing the capacity of all staff, associates and visitors so they understand, and are supported in meeting, their safeguarding roles, responsibilities, and their duty to do no harm. We take positive action to prevent anyone who might be a risk to children and programme participants from becoming involved with us.*
- *Promoting child and programme participant safe practices, approaches, interventions and environments which respect, recognise and respond to the specific safeguarding needs and the different protection risks faced by children and programme participants based on their gender and other identities. We will challenge and do not tolerate inequality, discrimination or exclusion.*
- *Encouraging, facilitating and receiving all reports related to safeguarding or SHEA concerns. We are committed to ensuring appropriate, adequate and accessible mechanisms for reporting are in place for staff, associates, children, programme participants and communities at large.*
- *Responding in a timely, effective, safe, comprehensive, procedurally fair and confidential manner to all Safeguarding complaints, allegations and incidents, ensuring victims'/survivors' perspectives, voices and best interests are central to any efforts to prevent and respond to any safeguarding concern and providing necessary support to victims/survivors. We have zero tolerance to inaction on safeguarding and SHEA reports.*

APPLICABLE REQUIREMENTS

Plan International's values outline how we should work to secure the changes we want to see in the world and to achieve our purpose. Our Values and Behaviours Framework, underpinned by feminist leadership principles, describes in practical terms, how we need to behave to live those values and deliver our leadership commitments and strategy. Our commitment to safeguarding and the application of this policy is driven by our commitment to these values and the following set of guiding principles.

Guiding Principles

1. **Indisputable Rights:** All children under 18 years have equal rights to protection from all forms of violence as declared in Article 19 of the United Nations Convention on the Rights of the Child. In addition, the Universal Declaration of Human Rights recognises fundamental human rights, the dignity, worth and equal rights of people at any age.

Plan International respects and upholds the rights of all children and programme participants irrespective of any identities they may hold including their: age, sex, gender, gender identity, sex characteristics, sexual orientation, nationality, ethnic origin, colour, race, language, religious or political beliefs, marital status, disability, physical or mental health, family, socio-economic or cultural background, class, any history of conflict with the law or any other aspect of their background or identity. Inequality, exclusion, and

¹⁵ Unwelcome sexual advance or an unwelcome request for sexual favours or engages in other unwelcome conduct of a sexual nature, or indecently exposes themselves. See Appendix 1 for full definition.

¹⁶ Any actual or attempted Abuse of a position of vulnerability, differential power, or trust for sexual purposes. It includes profiting monetarily, socially, or politically from Sexual Exploitation of another.

¹⁷ The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. See Appendix 1 for full definition.

discrimination will be challenged and will not be tolerated.

All children and programme participants must be empowered and encouraged to fulfil their potential. Decisions made about children and programme participants will be made as far as possible with their participation and in their best interests giving full consideration to how such decisions will affect them. Children and programme participants will be encouraged to express their views and will be given 'due weight' in accordance with their age and level of maturity.

- 2. Zero Tolerance for Inaction:** Plan International believes that any form of violence is unacceptable and inaction on reports of any Safeguarding concern will not be tolerated. We recognize that zero tolerance does not mean there will be no reports or incidents, nor does it mean that all reports of breaches will result in termination of contracts or employment without due process and investigations. Instead, zero tolerance for inaction means we will act on all safeguarding concerns and allegations, ensuring that our actions are timely, appropriate, and centred on the best interest of the victim/survivor¹⁸, taking into account their specific safeguarding needs and vulnerabilities.

We will take all reports of safeguarding concerns seriously and we will act on these reports with the highest priority, and in accordance with the guiding principles and our procedures. Where investigations are launched, they will be carried out by experienced and qualified professionals, who are trained on sensitive investigations and a victim/survivor centred approach.

No one will be victimised for making a complaint which is made without malice or for personal gain. Plan International is committed to working with complainants¹⁹ and victims/survivors to ensure they are central to any response, are not further harmed or disempowered by any processes, and receive support throughout.

Reports can be made using the relevant and/or country specific procedures which must and will be given to all staff, visitors and associates.

Reports can also be made anonymously in accordance with Plan International's Whistleblowing Policy.

Reports which are malicious will be sanctioned appropriately.

- 3. Survivor-Centred:** All decisions and actions in response to safeguarding concerns and allegations and breaches of this policy will be trauma informed: Plan International will recognise the potential and actual impacts of trauma and aim to prevent re-traumatisation. We will be guided by the safety, rights, needs, wishes and empowerment of the victim/survivor, while ensuring procedural fairness to all parties. We will retain the privacy and dignity of the victim/survivor by maintaining confidentiality (within the limits of responding to the report), treating them respectfully, involving them in decision making, as appropriate, and providing comprehensive information and committing to referrals and assistance to support the recovery and safety of the victim/survivor.

Referring incidents of a potentially criminal nature to law enforcement or relevant authorities will be done after taking into account the wishes of an adult victim/survivor, the best interest assessment of a child victim/survivor and the welfare and safety of all parties. Where local or national laws mandate Plan International to report a potential crime to the police or welfare authorities an appropriate safety plan that manages the risks for all concerned must be implemented.

Support will be offered to Victims/Survivors and complainants according to our survivor-centred approach and regardless of whether a formal response is carried out (e.g. an investigation). Support will also be offered as appropriate to others involved in an incident management process, recognising the impact this can have, for example on witnesses and those accused of carrying out inappropriate or harmful behaviours. This can include specialist psychosocial counselling, medical support, legal support and/or access to other specialist and appropriate support as needed. Victims/Survivors and complainants can choose if/when they would like to take up the support options available to them. We are committed to learning from victims/survivors and complainants and being guided by them, where safe and appropriate to do so. We will ensure that cases are referred to appropriate professionals and organisations and that due diligence is taken to ensure that they act in line with our values and puts the welfare of all parties concerned as the highest priority.

- 4. Equality and Inclusion:** Plan International recognises that imbalances in power and gender and social inequality are key drivers for violence and SHEA. We recognise that in all societies in which we work, gender and social inequality exists; staff, associates, and programme participants may have learned to accept unequal norms and stereotypes; and that the very nature of our work can unintentionally create and maintain differential power and unequal opportunities.

¹⁸ 'Victim' is a term often used in the legal and medical sectors. 'Survivor' is the term generally preferred in the psychological and social support sectors because it implies resiliency. We use both terms as part of our survivor-centred approach and allow those affected to choose the term they prefer. Please see Appendix 1 for the full definition of victim.

¹⁹ Person making a complaint; it may be the person who experienced what is being reported, or it may be another person. Please see Appendix 1 for the full definition of complainant.

We take an intersectional approach to safeguarding. We consider the ways that multiple identities together create a person's experiences of power, gender and social inequality and therefore vulnerability to violence and SHEA. We take appropriate measures to address implicit and explicit biases and other forms of discrimination and violence, which may arise because of a person's diverse identity and/or position in society. We support the empowerment and inclusion of victim/survivors in the response process, in a manner that promotes equality, equity and ultimately their increased safety and protection.

5. **Shared Responsibility:** All staff, associates and visitors must be aware of and adhere to this policy. Everybody has a responsibility to prevent harm, violence and SHEA. Everybody must take their safeguarding responsibilities seriously and uphold the principles of the policy.

In turn, Plan International will work collaboratively with others to support and strengthen the capacity of partners, the sector and our global organisation to prevent and respond to all Safeguarding concerns. We are responsible for creating safe environments for all children and programme participants. This includes never knowingly allowing a person to become or continue to be, a sponsor where the person: is currently in prison for any type of crime including awaiting trial; or has previously committed crimes against children.

6. **Open and Accountable:** Plan International is committed to openness and transparency. Our leaders will set clear expectations and take personal and organisational responsibility to create safe and inclusive environments to ensure a culture of equity and inclusion. We will maintain our responsibility to provide information on this Global Policy to all programme participants, children, members of communities in which we work, staff, associates and visitors. We will explain our commitments so that everybody understands how to exercise their rights and how to report any concerns related to safeguarding. In order to remain accountable to all staff, associates, visitors and programme participants we will ensure safeguarding concerns can be raised and discussed; poor practice and inappropriate behaviours can be challenged and addressed; and safeguarding measures will be regularly reviewed and strengthened.

We will maintain our responsibility for ensuring safeguarding is mainstreamed into all we do and all our approaches. Our Safeguarding Implementation standards lay down the requirements for ensuring safeguarding measures are embedded in all parts of our operations and interventions. General guidelines for implementing Safeguarding in Practice are provided in Annex 2.

ROLES AND RESPONSIBILITIES

1. All staff, associates and visitors shall:

- a. commit and contribute to an environment where children and programme participants feel respected, supported, safe and protected;
- b. never act or behave in a manner that results in violence against a child or programme participant or places a child or programme participant at risk of violence;
- c. be aware of and adhere to the provisions of this Global Policy.
- d. confidentially report any concerns, rumours, suspicions or allegations of harm, violence or SHEA and/or breaches of this policy immediately (or at least within 24 hours) using the relevant and/or country specific procedures.

2. All staff shall:

- a. comply with this Global Policy, including the Safeguarding Code of Conduct (Annex 1);

3. Associates and visitors shall:

- a. agree, by signing, to complying with either Plan International's Safeguarding Code of Conduct (Annex 1 or other appropriate guidance developed by a manager²⁰ at the relevant Plan International Entity on appropriate behaviour towards children and programme participants as relevant to their engagement using the Safeguarding Code of Conduct (Annex 1) as a guide; **or**
- b. comply with their own Code of Conduct, provided the contracting manager ensures that it complies, and is consistent, with this Global Policy.

4. Managers shall ensure that:

- a. children, programme participants and communities with whom we engage, work or are in contact are made aware of the provisions of this Global Policy and have the confidence and ability to report any

²⁰ A staff member who has responsibility for line managing or supervising the work of staff or associates. Please see Appendix 1 for full definition of Manager.

incidents occurring against children and/or programme participants;

- b. staff, associates, and visitors are aware of the Safeguarding Implementation Standards that are applicable to their role or engagement with us;
- c. they support and develop systems which maintains an environment which is safe for and prevents violence against children and programme participants;
- d. they are accountable for ensuring that the Global Policy is fully embedded within their areas of responsibility in accordance with the Safeguarding Implementation Standards.

5. Directors²¹ shall ensure that:

- a. the relevant Plan International Entity has in place local procedures that are consistent with this Global Policy and with the global Reporting and Responding guidelines which outlines the reporting requirements and the manner in which they are escalated within each Plan International Entity. These local procedures should be developed with the assistance of local advisers and updated regularly, in line with policy revision or sooner if needed. The policy and applicable procedures must be made available in local languages and child-friendly formats;
- b. the relevant Plan International Entity implements our Safeguarding Implementation Standards as they apply to their context, the staff, associates, and visitors, and the children and programme participants with whom they engage, as well as the processes, programmes, projects, events and activities they undertake.

6. **Organisations that work with us** in carrying out our programmes, projects, processes, events and/or activities involving children and programme participants must comply with the Safeguarding Guidelines contained in Annex 2.

7. **All Plan International Entities** shall monitor compliance with this Global Policy through the mandatory tracking and auditing of the Safeguarding Implementation Standards and Safeguarding Code of Conduct (see Annex 1). Auditing against the standards will be led by PII's Global Assurance Department. In addition, we will work with and ensure the participation of children, programme participants, staff, associates and visitors to review, monitor and evaluate the implementation of this Global Policy.

Breaches of this Policy

Breaches of this policy will be investigated²² in accordance with the Global Reporting and Responding Guidelines, and the Plan International Entity's disciplinary procedures and contractual agreements. Referrals may be made to statutory authorities for criminal investigation under the law of the country in which the breach occurred.

Any allegation/suspicion of a breach made against a member of staff, associate or visitor will be dealt with as quickly as possible, in a fair and consistent way that provides effective protection for the victim/survivor and at the same time protects the rights of the person who is the subject of the allegation. Actions may be taken during an investigation stage that are intended to be precautionary and not a disciplinary sanction or an assumption of guilt.

Breaches may incur sanctions including disciplinary action leading to possible dismissal, termination of all relations including contractual and partnership agreements, and where relevant, appropriate legal or other such actions. The rights, intersecting identities and vulnerabilities of the alleged perpetrator will also be considered during the course of an investigation to inform an assessment of potential false or malicious accusations against them.

If a legitimate concern about the suspected abuse of a child or programme participant is raised but proves to be unfounded on investigation, no action will be taken against the reporter. However, appropriate sanctions will be applied in cases of false and malicious accusations.

²¹ An Executive Director of PII or a National Director.

²² Information will be gathered in order to determine whether wrongdoing occurred and, if so, the person(s) responsible. Please see Appendix 1 for full definition of Investigation.

APPENDIX 1: TERMS AND DEFINITIONS

When used in this document:

“Abuse” includes all forms of physical or mental violence, injury or violence, neglect or negligent treatment, emotional ill-treatment or psychological violence, sexual abuse and exploitation, harassment, and commercial or other exploitation. Acts of abuse can also take place online through, for example, the web, social media or mobile phones. It may be an intentional act involving the use of physical force or power or it may be failing to act to prevent abuse. Abuse consists of anything which individuals, groups, institutions or organisations do or fail to do, intentionally or unintentionally, which either results in or has a high likelihood of resulting in actual or potential harm to another’s wellbeing, dignity and survival and development.

“Associate” refers to a range of contracted paid and non-paid individuals who have committed to work with or support a Plan International Entity. It includes, among others, board members, volunteers (including community volunteers), interns, sponsors, researchers, donors, consultants and contractors, staff and/or representatives of partner organisations and local governments (when operating in partnership agreement with a Plan International Entity).

“Child” in line with the United Nations Convention on the Rights of the Child and for the purposes of this Global Policy, is defined as any person – girl, boy, young woman, young man, and children of other gender identities - under the age of 18 years (UNCRC Article 1). (See definition of Young Person/People or Youth below).

“Child Abuse” all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child’s health, survival, development or dignity in the context of a relationship of responsibility, trust or power.

“Child sexual abuse material” is defined as any representation, by whatever means of a child used for real or simulated sexual activities or any representation of the sexual parts of a child for sexual purposes. It also includes engaging in the production of, viewing, downloading and/or distribution of any such material (whether via the internet or not) and includes pseudo photographs, comics, drawings, and cartoons.

“Complainant” This is the person making a complaint; it may be the person who experienced what is being reported (the victim/survivor), or it may be another person (a third-party complainant) who becomes aware of an issue and makes the complaint.

“Director” is an Executive Director of PII or a National Director.

“Gender Responsive Intersectional Safeguarding” is a safeguarding approach that:

- a. Takes full account of individual’s gender and overlapping identities and experiences in order to understand the complexity of the prejudice and/or inequality they face, or conversely how this may lead to a heightened privileged status; and the consideration of this in their specific safeguarding needs
- b. Integrates safeguarding measures that addresses protection risks for all individuals with whom we work that stem from issues relating to gender and other identity bias and discrimination and creates safe spaces where it is safe to challenge and address inequality, power and bias.
- c. Requires us to reflect on our status as a prominent INGO and acknowledge the power imbalance this causes within the organisation (where within the organisation power lies, who typically are the “dominant” and “non-dominant” groups and how these impacts on decisions we take on safeguarding), as well as between the organisation and the wider society.
- d. Develops our capacity to analyse how individuals can be at risk of harm and abuse as a result of our work because of their particular identity (age, gender, sexual orientation, tribe, race, colour, disability etc.)
- e. Supports the empowerment and fosters the inclusion of individuals in all their diversity, particularly in the safeguarding process, in a manner that promotes equality, equity, inclusion and ultimately their increased safety and protection.

“Harm” is any detrimental effect on a child’s or programme participant’s physical, psychological, or emotional wellbeing. Harm may be caused by abuse or exploitation whether intended or unintended.

“Intersectional” Intersectionality is a theoretical framework for understanding how aspects of a person’s social and political identities (e.g., gender, sex, race, class, sexuality, religion, disability, physical appearance, programme participant, etc.) intersect, overlap, and compound to create interdependent forms of discrimination and privilege (or advantage/disadvantage). Intersectionality identifies advantages and disadvantages that are felt by people due to a combination of factors.

“Investigation” a process designed to gather information in order to determine whether wrongdoing occurred

and, if so, the person(s) responsible.

“Manager” refers to a staff member who has responsibility for line managing or supervising the work of staff or associates.

“National Organisation” or **“NO”** refers to a legal entity that has signed a Members’ Agreement and License Agreement with PII.

“PII” refers to Plan International, Inc., including when operating through one of its subsidiaries. It generally includes Global Hub, regional hubs, liaison offices, and country offices.

“PSHEA” stands for Preventing Sexual Harassment, Exploitation and Abuse. It refers to the responsibilities; preventative, responsive and referral measures that we undertake to prevent children and programme participants from being subject to sexual harassment, sexual exploitation and sexual abuse.

“Programme Participant”

Direct Programme Participants are the people who are the target of and who we know will be immediately affected by one or more programme/project outputs; irrespective of whether these are delivered directly by Plan International or by partners or organisations who are acting on behalf of Plan International.

- Direct programme participants are individuals who receive materials, equipment; interventions such as training, awareness raising, mentoring or other personal support.
- Direct programme participants may be a single member of a household (for example a mother participating in training on nutrition); or it may be all members in the household (for example, parents enrolled in nutrition programmes/projects for improved family nutrition and health).
- Direct programme participants include sponsor children and their family; advocates and participants in advocacy events or awareness raising; participants in Plan supported projects and programmes; members of Youth Advisory Panels. This not an exhaustive list.

Indirect Programme Participants are the people who are not the direct target of the project, but who we have good reason to expect will derive secondary benefits from the project outputs. These include individuals who:

- Benefit from the increased resources or capacities of a direct programme participant of the project. (For example: The children of the parents who received training in hygiene or parenting; or the family members who also benefit from the increased household income through the person who participated in savings groups.)
- Benefit from interventions that are aimed at improving the conditions for a community as a whole rather than the individual persons or households. (For example: The people who live in the catchment area of the health clinic, school or community water services that has been improved by the project).

Programme participants can be of any age and include young people who we engage with through our programming and influencing interventions.

Where a Programme Participant has a second identity with Plan, e.g. as intern, incentive worker, volunteer or other; their Programme Participant identity will be the dominant identity considered when handling any Safeguarding cases or concerns.

NB: The wider public who might be reached through awareness raising in public media or who might eventually benefit from changes in legislation or policy are not considered part of either direct or indirect programme participants. If counts for specific advocacy projects are required, this should be done by a different, more appropriate method.

“Safeguarding” is the responsibilities, preventative, responsive and referral measures that we undertake to protect children and programme participants, ensuring that no child or programme participant is subject to any form of harm as a result of their association with the organisation. This includes, ensuring that their contact with us and those associated with us and/or their participation in our activities, interventions and operations is safe and where there are concerns over a child or programme participant’s welfare or where a child or programme participant has been subject to violence, appropriate and timely actions are taken to address this and incidents are analysed so as to ensure continued learning for Plan International Entities.

“Sexual Abuse/Violence” The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It covers sexual offences including but not limited to: attempted rape (which includes attempts to force someone to perform oral sex); and sexual assault (which includes non-consensual kissing and touching). All sexual activity with someone under the age of consent is considered to be sexual abuse.

“Sexual Exploitation” Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. It includes profiting monetarily, socially, or politically from Sexual Exploitation of another.

“Sexual Harassment” A person sexually harasses another person if the person makes an unwelcome sexual advance or an unwelcome request for sexual favours or engages in other unwelcome conduct of a sexual nature, or indecently exposes themselves, in circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated.

Sexual Harassment can take various forms. It can be obvious or indirect, physical or verbal, repeated or one-off and perpetrated by any person of any gender towards any person of any gender. Sexual harassment can be perpetrated against programme participants, community members, citizens, as well as staff and personnel.

“SHEA” stands for sexual harassment, sexual exploitation and sexual abuse.

“Staff” refers to individuals who receive a regular salary for work in any Plan International Entity as well as individuals paid by or through a Plan International Entity but located in another entity.

“Victim/Survivor” a person who has experienced sexual abuse, exploitation, or harassment. The terms ‘victim’ and ‘survivor’ can be used interchangeably. ‘Victim’ is a term often used in the legal and medical sectors. ‘Survivor’ is the term generally preferred in the psychological and social support sectors because it implies resiliency. We use both terms as part of our survivor-centred approach and allow those affected by sexual abuse and exploitation to choose the term they prefer. A victim/survivor could be a programme participant or a staff member, associate or visitor.

“Violence” against a child, young person or adult includes all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, emotional ill-treatment or psychological violence, sexual abuse and exploitation, harassment, and commercial or other exploitation. Acts of violence can also take place online through, for example, the web, social media or mobile phones. It may be an intentional act involving the use of physical force or power or it may be failing to act to prevent violence against a person.

Violence consists of anything that individuals, groups, institutions or organisations do or fail to do, intentionally or unintentionally, which either results in or has a high likelihood of resulting in actual or potential harm to the child, young person or adult's wellbeing, dignity and survival and development.

“Visitor” refers to a range of persons who are visiting our offices or programmes/projects and may come into contact with children and young people through a Plan International Entity. A visitor may be a journalist, media, researcher, visiting sponsor or celebrity.

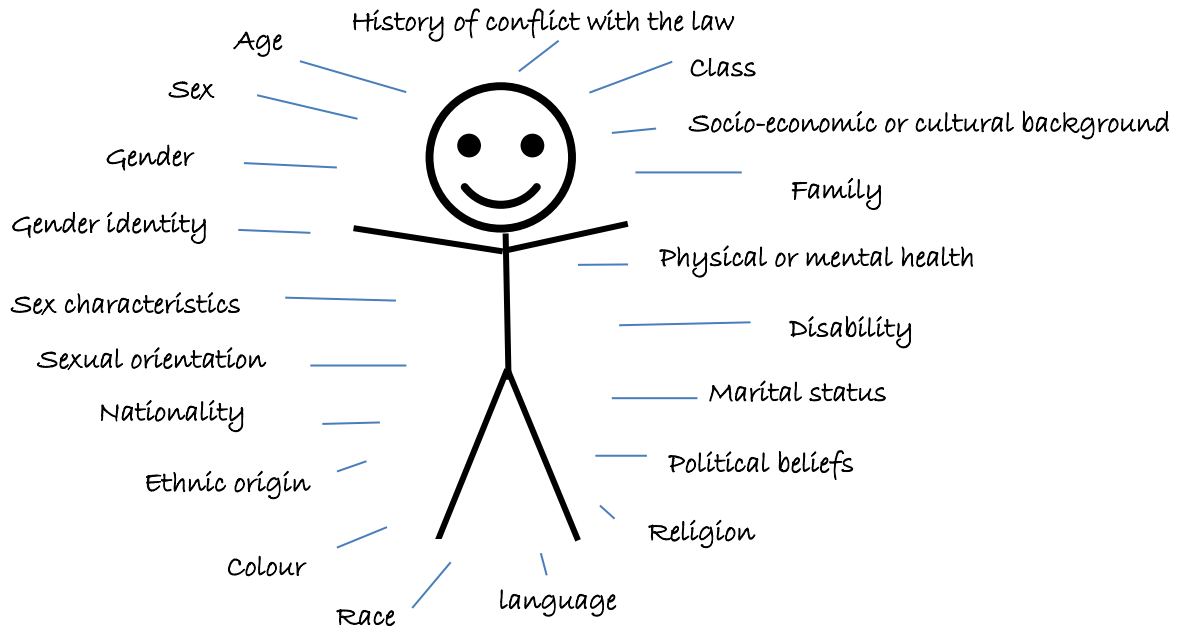
Vulnerability refers to a person's ability, which is limited by their social and political identities, to avoid, resist, cope with or recover from violence, exploitation, and abuse. Vulnerable is the greater risk of violence, exploitation, and abuse due to their intersecting identities, for example, due to their gender, sexual orientation, ethnic origin, disability, age or illness.

“Young Person/People” or **“Youth”** in line with United Nations definitions, include individuals – young women, young men, and young persons of other gender identities - aged 15 years to 24 years old. This group spans the categories of ‘children’, ‘adolescents’ and ‘adults’ but regards young people as having particular safeguarding needs and requiring distinct consideration aside from younger children and older adults.

APPENDIX 2: INTERSECTIONALITY

Intersectionality is a way of thinking about power, privilege, and gender that recognises a person's combination of social identities. Social identity is the part of each of us which identifies as a member of a social group. These social groups which impact on our identity may include age, sex, gender, gender identity, sex characteristics, sexual orientation, nationality, ethnic origin, colour, race, language, religious or political beliefs, marital status, disability, physical or mental health, family, socio-economic or cultural background, class, any history of conflict with the law, and more.

Intersectionality means we think about multiple forms of inequality (based on our social identities) at the same time rather than considering each of them separately and we understand how they overlap (or intersect) and compound to create a person's experience of prejudice and inequality, or power and privilege.



Instead of thinking a girl or woman's oppression based on sexism alone, or a Black person's oppression based on racism alone, or a disabled person's oppression based on ableism alone, intersectionality looks at how those identities intersect. For example, intersectionality would seek to understand how a disabled, Asian girl is affected by the overlapping and compounding prejudices and inequalities of sexism, racism, and ableism all at once rather than separately. This girl is cisgender²³, Asian, a person of colour and has a disability and may endure specific forms of prejudice and inequality that Asian boys might not, or Asian girls without a disability might not, or a white girl with a disability might not etc.

Social inequality is the existence of unequal opportunities and rewards for different social positions or statuses within a group or society.

²³ Cisgender describes someone whose gender identity corresponds to their sex assigned at birth

ANNEX 1: SAFEGUARDING CODE OF CONDUCT

Plan International is committed to creating a safe environment for children and programme participants. All staff have a duty to uphold the principles of the Global Safeguarding Policy and commit to maintaining an environment that prevents violence, both at work and outside of work. Further to this, sexual harassment, exploitation and abuse by staff (including those that work in our humanitarian response) constitutes acts of gross misconduct and therefore may be grounds for termination of employment.

As such, I agree that I will:

- a. Adhere to the Global Policy on Safeguarding and be open and honest in my dealings with children, programme participants, their families, and communities participating in programmes, projects, processes, events, and activities.
- b. Treat children and programme participants in a manner which is respectful of their rights, integrity, and dignity and considers their best interests regardless of age, sex, gender, gender identity, sexual orientation, nationality, ethnic origin, colour, race, language, religious or political beliefs, marital status, disability, physical or mental health, family, socio-economic or cultural background, class, or any history of conflict with the law.
- c. Create and maintain an environment which prevents violence, abuse and exploitation of children and programme participants ensuring that I am aware of potential risks with regards to my conduct and work, and take appropriate action so as to minimise risks to children and programme participants.
- d. Contribute to building an environment where children and programme participants are:
 - i. respected and empowered to participate in and discuss decision making and interventions into their safeguarding in accordance with their age, maturity and evolving capacities; and
 - ii. well informed on their safeguarding and protection rights and what to do if they have a concern.
- e. Display high standards of professional behaviour at all times, providing a positive role model for children and young people.
- f. Comply with all relevant international standards and local legislation in relation to child labour, and refrain from using children (those aged below 18 years) for domestic or other labour, if such work is inappropriate, exploitative or harmful given their age or developmental capacity, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury, exploitation, or violence. In addition, I understand that I must not use a programme participant of any age for domestic or other labour.
- g. Respect the privacy and confidentiality of children and programme participants associated with Plan International. This means I will:
 - i. Never ask for or accept personal contact details or invitations to share personal contact details (this includes email, phone numbers, social media contacts, address, webcam, skype, etc.) from any child, programme participant or family associated or formerly associated with our work or share my own personal contact details with such individuals except where this has been explicitly authorised by Plan International and/or for Plan International business purposes.
 - ii. Never disclose, or support the disclosure of, information that identifies children, programme participants, sponsored families or sponsor children, through any medium, unless that disclosure is in accordance with standard Plan International policies and procedures and/or has the explicit consent of Plan International. Media include paper, photographs, and social media.
 - iii. Never make any contact with a child, programme participant, or family members associated with Plan International's work that is not supervised by a (or another) member of Plan International Staff. Such contact may include but is not limited to visits and any form of communication via social media, emails, and letters.
 - iv. Always ensure that when on an official or work visit with Plan International and I wish to take pictures of children and programme participants associated with the organisation I will:
 - Always consult first with the local Plan International office to make sure that it is ok to take pictures in the local context and that the intended use of the pictures does not conflict with Plan International's policies.
 - Ask permission of the child or programme participant (or in the case of young children, their parent or guardian) informing them of the specific purpose(s) and intended use (including how and where) and respect their decision to say no making it clear that there will be absolutely no negative repercussions from denying such consent.
 - Ensure the images are respectful and do not affect negatively on their dignity and privacy.
 - Ensure that the use of the images does not put the child or programme participant at risk of being identified or located.
 - Never upload the images of children associated with Plan International or images of programme participants to non-Plan International social media pages without the full and explicit consent of Plan International.

- h. Report and respond to any concerns, suspicions, incidents or allegations of actual or potential abuse to a child or programme participant in accordance with applicable procedures of the engaging office.
- i. Cooperate fully and confidentially in any Plan International investigation of concerns or allegations of abuse to children and programme participants.
- j. Immediately disclose all charges, convictions, and other outcomes of an offence, which occurred before or occurs during association with Plan International that relate to exploitation and abuse of a child or young person.

I agree that I will not:

- a. Abuse, exploit or harass a child or programme participant or behave in any way that places a child or programme participant at risk of harm, including through harmful traditional practices such as, for example, Female Genital Mutilation, forced or child marriage.
- b. Fondle, hold, kiss, hug or touch children or programme participants in an inappropriate way or a manner that is contrary to cultural or social safeguarding norms.
- c. Engage in any form of sexual activity or develop physical/sexual relationships with anyone under the age of 18 regardless of the age of consent locally. Mistaken belief in the age of a child is not a defence.
- d. Engage in sexual relationships with Plan International programme participants, regardless of their age, as these undermine the credibility and integrity of Plan International's work and are based on inherently unequal power dynamics.
- e. Engage programme participants in any form of sexual activity that involves the exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. This includes exchange of assistance that is due to programme participants.
- f. Use language or behave towards a child or programme participant in a way that is inappropriate, offensive, abusive, sexually provocative, demeaning or culturally inappropriate.
- g. Have a programme participant or child/children with whom I am in contact in a work-related context, stay overnight at my home or any other personal residential location or accommodation.
- h. Sleep in the same room or bed as a programme participant or a child with whom I am in contact in a work-related context. Where it is necessary to sleep close to unaccompanied children and programme participants, I will make sure that another adult is present and it is in line with authorised procedures.
- i. Do things of a personal nature for a programme participant or child with whom I am in contact in a work-related context, (e.g. taking a child to the toilet/bathroom; helping them get un/dressed etc.) that they can do for themselves.
- j. Spend time alone away from others with programme participants or children with whom I am in contact in a work-related context; I will always make sure that another adult is with me and/or I am with the child/young person in an open public place, where others are around and in plain view of others.
- k. Hit or otherwise physically assault or physically abuse children or programme participants.
- l. Use any form of physical punishment/discipline, of any degree, or use of physical force of any kind towards children and programme participants.
- m. Act in ways that shame, humiliate, belittle or degrade children and/or programme participants, or otherwise perpetrate any form of emotional abuse.
- n. In the course of my work discriminate against, show differential or preferential treatment to, or favour particular child(ren) and programme participant(s) to the detriment of them or others.
- o. Develop relationships with, engage in any practice with or develop behaviour towards children and programme participants, which could in any way be deemed or interpreted as exploitive or abusive.
- p. Condone or participate in behaviour of children or programme participants, which is illegal, unsafe, or abusive.
- q. Use any computers, mobile phones, video and digital cameras, or any such medium to exploit, harass or bully children or programme participants.
- r. Access, view, create, download, or distribute child sexual abuse material¹ (commonly referred to as 'child pornography') via computers, mobile phones, or video/digital cameras, other electronic devices or any other media, be it personal property or property owned by Plan International.

The above is not an exhaustive list. Staff, associates, and visitors should consider all related actions and behaviour which may compromise the rights and safeguarding of children and programme participants.

Personal Conduct outside Work or Engagement with Us

We do not dictate the belief and value systems by which staff, associates, and visitors conduct their personal lives. However, actions taken out of working hours that are seen to contradict this policy or bring the organisation into disrepute in regard to our Safeguarding standards may be considered a violation of the policy. Our staff, managers, associates, and visitors are required to adhere to principles of the Global Policy on Safeguarding both at work and outside work.

ANNEX 2: GUIDELINES FOR IMPLEMENTING SAFEGUARDING IN PRACTICE

These guidelines outline the requirements for safeguarding and PSHEA of children and programme participants that are applicable to organisations that work with Plan International Entities in carrying out our programmes/projects.

They are particularly applicable to organisations assessed as having contact with children and programme participants, working with children and programme participants, and/or whose projects, programmes, processes, activities, advocacy and influence work impact on children and programme participants. Organisations funded by a Plan International Entity are expected to build on these guidelines as appropriate based on the nature of their activities and risks to children and programme participants.

The guidelines illustrate our commitment to support and respect children's and programme participants' rights to be protected from harm, and to provide a safe and protective environment for children and programme participants who are involved with any programmes/projects funded by a Plan International Entity.

The guidelines should be applied in relation to children and/or programme participants as appropriate, depending on the group the organisation works with.

- 1. Prevention:** The Organisation must take appropriate measures to manage child and/or programme participant safeguarding and PSHEA risk factors and prevent abuse and exploitation before it occurs. Prevention measures should include organisational safeguarding and PSHEA policies, codes of conduct and associated procedures; the management of risks in relation to its operations, activities and interventions; and the production and promotion of 'child and programme participant friendly' safeguarding and PSHEA information and resources.
- 2. Code of Conduct:** Each Organisation is required to ensure that their personnel avoid any behaviour or conduct that compromises the safety and protection of children and/or programme participants within its activities, operations and programmes. In addition, programmes and activities working directly with children and/or programme participants or involving direct contact between the same should develop guidance on expected and acceptable behaviour for children and/or programme participants towards each other. This should be incorporated into policy and practice documents.
- 3. Gender Equality and Non-Discrimination:** The Organisation should ensure that all Safeguarding and PSHEA policies and procedures take into account gender equality and non-discrimination requirements; adopting an intersectional approach. Recognising that girls, boys, young women, young men, and children and programme participants of different gender identities may face different risks relating to their safety and protection and that all children and/or programme participants have an equal right to protection, irrespective of: age, sex, gender, gender identity, sexual orientation, nationality, ethnic origin, colour, race, language, religious or political beliefs, marital status, disability, physical or mental health, family, socio-economic or cultural background, or class.
- 4. Screening Procedures:** There should be detailed screening procedures for all personnel (including unpaid volunteers) who will come into contact with children and/or programme participants (directly or indirectly). Screening procedures should be as available in each country and updated on a regular basis, where possible. Screening procedures may include certificate of good conduct, police reference checks or equivalent, verification that applicants are not listed in national registries of child offenders; a detailed application and interview process; references who support the applicant's suitability to work with children and/or programme participants.
- 5. Awareness:** The Organisation should ensure that all personnel, sub-contractors or consultants or affiliates involved with programmes are aware of safeguarding and PSHEA risks, policies and procedures; and their safeguarding and PSHEA responsibilities. In addition children and/or programme participants engaged and their parents, guardians or carers should be informed of the same so that they know what behaviours to expect and how to report any concerns.
- 6. Capacity Sharing:** The Organisation should develop and share the capacity of all who work with and for children and/or programme participants to appropriately prevent, detect, report and respond to safeguarding and PSHEA concerns and particularly as they pertain to differing gender and other identities. Efforts should be made to ensure organisational policies and practices are understood and can be effectively implemented through mandatory inductions and on-going training courses for all staff and volunteers and other associates.
- 7. Participation of children and/or programme participants:** Children and/or programme participants should be actively, meaningfully and ethically involved in the development of safeguarding and PSHEA measures in accordance with their evolving capacities. Children and/or programme participants must not be treated simply as objects of concern but rather listened to and taken seriously and treated as individual people with their own views.

8. **Reporting mechanisms for children and/or programme participants and staff:** Mechanisms should be established that enable the safe reporting of safeguarding and SHEA concerns. Such mechanisms should ensure appropriate escalation of concerns within the organisation, referral to the appropriate authorities and confidentiality. In addition, child and programme participants reporting mechanisms should be accessible, friendly and sensitive to their differing needs. It is important that complaints mechanisms are established with the participation and input of different groups of children and programme participants, as well as communities, so they work for all users as necessary.
9. **Response and Follow Up:** Organisational policies and procedures should include appropriate measures to support and protect children and/or programme participants when concerns arise. All measures taken to respond to a safeguarding and SHEA concern should take into account the best interest of the child or programme participants and be sensitive to their differing gender and other identities ensuring they are kept safe and protected. Response measures should be appropriately risk assessed and endeavour to ensure no further harm comes to the child and/or programme participant as a result of any actions taken by the Organisation.

Concerns should be written up and information kept in accordance with the privacy and confidentiality policies of the Organisation and/or local legislation. In addition, organisational processes should ensure response evaluation and follow up for organisational learning.

The Organisation should also advise Plan International of any complaints of abuse to children and/or programme participant in line with the working agreement.
10. **Implementation, Monitoring and Review:** The implementation and monitoring of the Safeguarding Policy for each Organisation should be reviewed at regular intervals as determined necessary by the Organisation, preferably at least every three (3) years, where possible.
11. **Sanction and Discipline of Organisation personnel:** The Organisation policies and procedures should provide for appropriate sanctions and disciplinary measures which ensures children and programme participants are protected from further potential harm. This may include the immediate suspension of personnel until such time as the allegations are followed up and either substantiated or refuted and/or where personnel is convicted of abusing a child or programme participant, the said personnel is immediately terminated with cause from his or her position.
12. **Informed Consent:** The Organisation should provide children (and their parent(s)/legal guardian(s) where applicable) and/or programme participants, with all necessary details (including on any associated risk,) to make an informed decision regarding their participation in programmes and activities, including any voice recordings, video or photographs of children and/or programme participants (including how and where these will be used). Participation and/or usage of information and/or images should only take place after consent is obtained.
13. **Protection of Personal Information:** Personal information regarding any child or children and/or programme participants, whether or not such information is obtained as part of the programmes/projects involving children and/or programme participants, should be treated confidentially. There should be clear procedures showing the responsibilities within the organisation for accessing and using such data with appropriate authorisations, in accordance with Local and Global Data Privacy frames. In addition, such data should not be disclosed to any third party, except in accordance with the policies of the Organisation or as required by applicable local laws. Personal information includes, but is not limited to, any information that can be linked to or used to identify a child and/or programme participant.
14. **Working with partners:** The Organisation should ensure adequate safeguarding and PSHEA assessments are made as part of its due diligence processes when it comes to partnership working. Third party entities that are contracted or supported to work with children and programme participants must be subject to the same safeguarding and PSHEA principles and approach outlined in the Organisations policy and procedures. Vendors, suppliers and other contractors that may be in direct or indirect contact with children or programme participants must also be subject to appropriate safeguarding and PSHEA measures.

ANNEX 3: DO NO HARM DECISION TREE

A. We do no harm to:

Any child irrespective of their association with the organisation	Any Programme Participant irrespective of age -i.e. child, young person or adult whom we serve through our programmes/interventions
If it is reported to Plan that a Plan Staff, Associate or Visitor has harmed/committed an act of violence against a child we will take action under the Global Safeguarding Policy'.	If it is reported to Plan that a Plan Staff, Associate or Visitor has harmed/committed an act of violence against a programme participant we will take action under the Global Safeguarding Policy
Furthermore, where the abuse of a child in the community is reported to Plan or where a child discloses abuse to us and this act is not perpetrated by any Plan Staff, Associate or visitor we will respond to this in line with the local protection mapping (a minimum requirement of all Plan offices) and refer the issue on to the correct agency/authority/local support services for care and attention and/or absorb issues into our protection and other programming interventions as appropriate/needed/can be done.	

B. 'Is it a Safeguarding Case?' Decision Tree

Question	Yes	No
1. Is the alleged victim/survivor aged under 18?		
2. Has a local child protection law been broken / is the alleged action against local child protection laws?		
3. Is the alleged victim/survivor a Plan Programme Participant?		
4. Is the alleged victim/survivor a Plan Sponsored Child?		
5. Is the alleged victim/survivor an immediate family member Plan Sponsored Child?		
6. Does the alleged victim/survivor receive any benefit, directly (e.g. Programme Participant) or indirectly (e.g. immediate family member of a Plan Programme Participant), that is funded through Plan project/programme activity budget funds?		
7. Does Plan have the power to withhold this benefit?		
8. Could the alleged victim/survivor fear reprisal or any negative consequence if they were to: <ul style="list-style-type: none"> • submit a report/complaint; • refuse/reject any physical/sexual/romantic advances; and/or • end any physical/sexual/romantic relationship 		
9. Has the alleged victim/survivor received any goods, preferential treatment or money in exchange for sex or sexual favours?		

If you answer **no to all** of the above questions this incident does not fall under the scope of the Global Safeguarding Policy.

If you answer **yes to any** of the above questions this incident falls under the scope of the Global Safeguarding Policy. Please proceed to Decision Tree C below to determine if it is an internal or external case.

Please note however, that where a Plan staff harms an adult (i.e aged 18 years and above) who is not a programme participant, and this is reported to Plan, you will need to report the issue under the PII Conduct for staff-on-staff misconduct or acts which bring the organisation's reputation into disrepute.

C. Reporting under the policy

What do you need to report?

Under the policy you need to report:

- a. Where *the alleged perpetrator is a Plan International Staff, Associate or Visitor*, all safeguarding concerns and breaches of the policy (including those related to our interventions, activities, operations and engagement) must be reported. These cases are also referred to as internal cases.
- b. Where *the alleged perpetrator is outside the scope of the policy* (i.e. not a Staff, Associate or Visitor) only safeguarding concerns relating to sexual abuse and exploitation, a potential crime as per the local legislation and/or other serious forms of violence which are reported to the Plan International office/staff or Plan International is made aware of should be reported under the policy. These cases are also referred to as external cases.
- c. All types of abuse and violence regardless of who the perpetrator is *where local law so requires*.

Who do you report to?

Under the policy each office has staff designated to deal with breaches of the Global Safeguarding Policy. These staff are known as the [Safeguarding \(and PSHEA\) Focal Points](#).

IMPORTANT: If you have a concern, don't waste time wondering whether the concern is something that should be reported under the policy. You should immediately (at least within 24 hours) make a report to your Safeguarding (and PSHEA) Focal Point, line manager and/or the relevant Office Director. They will then take further action to ensure that the issue is addressed and appropriate referrals are made in line with local procedures.

Please note that reports can also be made anonymously in accordance with Plan International's Whistleblowing Policy.

It is the responsibility of your local/engaging office to provide you with written guidance (and training as appropriate to your engagement with Plan International) **on how to report and respond** to safeguarding concerns and breaches of the Global Safeguarding Policy (this will include what should be reported and to whom to report). If this is not done, ask to speak to your engaging manager, Office Director or [Safeguarding \(and PSHEA\) Focal Point](#).

Framework for ethical MER

1. STATEMENT FOR ETHICAL MER

The framework for ethical monitoring, evaluation and research, hereafter referred to as the framework, sits under and expands on Standard 1 in the MERL Standards and the Principles outlined in the MERL Policy. It establishes our commitment to ethical standards in monitoring, evaluation and research initiatives and ensures that the well-being, dignity, rights and safety of children, young people and other participants in data collection are respected and protected. The framework for ethical MER encompasses the following topics:

- Plan International's six ethical principles for monitoring, evaluation and research;
- safeguarding of children and young people in MER initiatives;
- applying ethical standards in MER initiatives;
- further resources to support ethics in MER.

The framework applies to:

- all Plan International Offices, including National Offices, Country Offices and Regional Offices.¹
- all MER initiatives whether they are conducted by Plan International staff, consultants or partners.
- Monitoring, evaluation and research initiatives, real-time reviews and feedback mechanisms in humanitarian and emergency settings.

In cases where MER initiatives are funded by grants from an organisation that has its own ethical framework, the framework which is more protective should be applied.

As a child-rights organisation that adheres to a rights-based approach and to gender equality, Plan International recognises that there is no 'one-size-fits-all' approach for ethical MER, and we acknowledge that the delivery of ethical MER must be responsive to the diverse perspectives, identities and vulnerabilities of children, young people and adults, as well as prevailing power dynamics. Furthermore, we understand that those conducting MER may be faced with difficult, changing and unclear situations and unexpected ethical dilemmas. While there is no 'one-size-fits-all' model for how to conduct ethical MER in the many different contexts that Plan International is working in, all MER initiatives should adhere to the ethical principles outlined in this framework and do their utmost to incorporate ethics throughout the whole MER project cycle.

We are there to help

In case you have any questions, are unsure how these guidelines apply to your work, or want to discuss an ethical concern, please get in touch.

2. ETHICAL PRINCIPLES

Plan International commits to six key principles for ethical MER.

1. Respecting and protecting the well-being, dignity, rights and safety of all participants

¹ All Plan International Inc. offices, whether they operate through a branch office or as a subsidiary, and all National Organisations that have signed a Members' Agreement and Licence Agreement with Plan International, Inc. (all of these entities are generally referred to as "Plan International") because the framework is derived from the Monitoring, Evaluation, Research and Learning Policy, which is a sub-policy of the Global Programme and Influencing Quality Policy, and supporting MERL Standards.

How does Plan International define participants and data collectors in MER?

Participants are all people, children and adults that we obtain data from, through information gathered directly or indirectly from the individual participating in a MER activity.

Data collectors are those who are hired by Plan International or a partner organization to collect the data (either on a voluntary or paid basis) and/or employed by Plan or a partner organization.

Please note however, that some research methodologies use participants also as data collectors e.g. participatory action research.

MER is conducted with integrity and in a manner, which protects the well-being, dignity, rights and safety of all individuals involved and upholds the fundamental principles of non-discrimination, gender equality, inclusion and equal participation. The best interests of all participants, and especially children and young people, is placed at the centre of the MER initiative. It is also important that the research or evaluation has a clear purpose and outlines actions to be taken, establishing trust and increasing accountability to those communities affected by the MER initiative. Overall, you should ensure the research or evaluation makes a positive contribution to the intended communities involved.

2. Assessing harms and benefits

Ethical MER initiatives have an identified purpose and a clear objective on how the data collected will be used to inform Plan International's work. All MER initiatives need to make a contribution to knowledge and should be of high quality.² Teams working on MER initiatives must take steps to ensure that benefits outweigh any risk of harm to participants and data collectors. When conceptualising and designing the MER activity, involved teams carefully consider the potential risks of harm to participants and data collectors through risk assessments. The identified risks must be mitigated through robust safeguarding measures and precautions which are responsive to gender equality and inclusion issues and prevailing power dynamics. It is important to also think through environmental harms and benefits, for example making local travel arrangements and choosing train travel where available and carbon offset air travel.

3. Reporting and responding to safeguarding concerns

Teams working on MER initiatives ensure, in line with the [Global Policy on Safeguarding Children and Young People](#), that up-to-date, open and gender-responsive safeguards are in place to prevent any potential risks of harm and to respond to safeguarding concerns if they arise. Where necessary, Plan International makes access to support for participants and/or data collectors available. If medical, psychological or legal issues or questions are raised by a participant, including suspicions or disclosures of child abuse, Plan International ensures timely referrals to appropriate organisations or services that are qualified to deal with the issue.

4. Engaging in ongoing reflection

Ethics are an integral part of any MER initiative and its principles must be embedded throughout the whole MER process. Therefore, everyone who works on a MER project must reflect on ethics continually throughout the MER process, adapt where necessary and respond quickly to ethical challenges that arise. This includes paying attention to the assumptions, values and beliefs, including gender related biases and stereotypes, of researchers, evaluators, data collectors, translators and others involved in the research, which might influence the MER initiative and have an impact on participants.

5. Ensuring voluntary, informed participation

Consent for participation is informed and truly voluntary, free from any coercion or undue influence. Participants are given appropriate information about the purpose, methods and intended use of the data collected; what their participation involves; and what the risks and benefits are. These must be

² MER initiatives that do not add value and/or are poorly implemented can be argued to be unethical as they waste respondents' time and expose them to unnecessary risks.



communicated in an appropriate way taking account, for example, gender, age and ability. Participants are given the option to withdraw their participation at any stage during the data collection and until an agreed, and clearly communicated, date after the data collection of the MER activity, without facing repercussions or disadvantages. Arrangements should also be in place for participants to withdraw consent after the agreed date in case participation puts the respondent at risk. Where secondary data is used for MER initiatives, investigators have to obtain proper permissions to use such data and ensure it is de-identified prior to analysis.

Generally, where the participant is under 18, Plan International first seeks the appropriate consent of the participants' parent or guardian.³ Assent is then gained from the child participant. Importantly, both the parent or guardian's consent and the child participant's assent are required, data collection cannot commence without both. For example, if the parent or guardian provides consent, but the child participant does not provide assent then they cannot be involved in the data collection activity, and vice versa. Plan International recognises that there might be exceptions to this rule due to local context or the context of the young person.⁴ Exceptional cases must be assessed by local staff and documented in the safeguarding risk assessment. In addition, processes to collect voluntary and informed consent from participants will need to be adapted accordingly to ensure children and young people's safe and ethical participation.

6. Ensuring confidentiality and anonymity

Plan International ensures that confidential information obtained through MER initiatives is stored and handled securely to ensure integrity and protect the privacy of participants. Plan International's [Data Privacy Policy](#) and [Data Retention Policy](#) apply to MER initiatives. Participants are made aware of who will have access to their personal data and how it will be used. However, participants are also made aware of the boundaries to confidentiality, in line with Plan International's [Global Policy on Safeguarding Children and Young People](#) and procedures, including what will happen in the event of a disclosure of abuse.

As a standard, anonymity for participants is ensured. However, where in exceptional cases individuals want to be identified, appropriate permission can be sought in the consent process. Participants are also made aware of the boundaries to confidentiality, in line with safeguarding policies and procedures, including what will happen in the event of a disclosure of abuse.

3. SAFEGUARDING OF CHILDREN AND YOUNG PEOPLE IN MER INITIATIVES

Ethical MER considers all potential risks and implications to any MER participant and is therefore broader than the scope of the [Global Policy on Safeguarding Children and Young People](#). However, safeguarding is a critical part of ethics. The following section describes how Plan International's safeguarding commitment, especially towards children and young people, must be incorporated into an ethical MER approach.

As a child-rights organisation, Plan International believes that involving children and young people in MER initiatives is important. Through listening to children's and young people's voices and views on issues that affect them we can better understand their lived realities and can design stronger programmes and influencing interventions. But there are specific risks of harm that arise when conducting MER initiatives with children and young people; their participation in MER initiatives can

³ This principle is set out in Plan International's Data Privacy Policy as well as the MERL Standards.

⁴ Exceptions to obtaining the parent's or guardian's consent for participants who are under the age of 18 might include the following situations: where a participant of the age of under 18 is married and lives with their spouse; where minors are living in separation from their parents/guardians due to humanitarian disaster or migration, where the legal age of majority is below 18. This is not a comprehensive list of exceptions given the many contexts within which Plan International operates.

expose them to risks of various forms of violence before, during and after their engagement. The team conducting a MER initiative must be aware that during data collection there is a heightened chance of being exposed to cases and disclosures of abuse of children and young people. As such, this demands careful consideration of - and establishing measures to address - safeguarding and safety issues.

Plan International's [Global Policy on Safeguarding Children and Young People](#) states that Plan International and anyone who represents Plan International – including data collectors, consultants or partners – has a serious responsibility and duty to ensure that they do not in any way harm, abuse or commit any other act of violence against children and young people. It also emphasises that children and young people must not be placed at risk of harm during participation in any Plan International programme or intervention, including any MER initiative.

Below are the key steps for embedding safeguarding into a MER initiative. The lead of the MER initiative is responsible for ensuring that all steps are followed. For further information on how to implement safeguarding in MER initiatives consult the [Safeguarding in MER guidance](#) as well as the safeguarding [manual on Business Standard 2: Safe Programming, Influencing and Research](#).

1. All MER initiatives that collect primary data need to complete the mandatory [MER Safeguarding Risk Assessment](#) at the start of a MER initiative.
2. Through the Safeguarding in MER Risk Assessment check the sensitivity of the approach and topic of a MER initiative and ensure that appropriate steps are taken in response.⁵
3. Recruit, onboard, train and manage everyone who works on the MER initiative – including consultants, partners and data collectors - in line with the [Global Policy on Safeguarding Children and Young People and its Code of Conduct](#).
4. Make information about local protection mechanisms and sources of support available to the team working on the MER initiative and participants.
5. Obtain voluntary and informed consent from MER adult and child participants and, where required and appropriate, their parents/guardians. When seeking consent from participants and their parents/guardians, be aware of power dynamics between the participant and Plan International staff, volunteers or partners.
6. Conduct MER activities in a setting that is safe and inclusive for participants.
7. Ensure duty of care and implement agreed protocols for responding to and reporting safeguarding concerns or disclosures.
8. Make practical arrangements for securely handling, storing and destroying participants' personal data, including safeguarding disclosures and sensitive information, in line with your data retention policy. [See Plan International's [Data Privacy Policy](#) and [Data Retention Policy](#)].

4. APPLYING ETHICAL STANDARDS IN MER INITIATIVES

The [MERL Standards](#) state that MER initiatives must adhere to ethical standards in order to ensure that the rights and the well-being of participants are protected. This section provides information on which steps MER initiatives must take in order to meet minimum ethical standards.

By applying a streamlined approach on how to incorporate ethical standards in MER initiatives, Plan International is:

- ensuring that best practice in data collection is followed to make sure that all participants and data collectors are protected

⁵ Sensitive topics of a MER initiative could, for example, include: violence in all its forms, SRHR topics and other topics that might be taboo in the specific context of the participants involved in the MER initiative. Sensitive approaches to data collection could, for example, include: prolonged duration of a participant's involvement that leads to the participant missing school or work, interviews where participants are asked to recall experiences that might have been traumatic.



- ensuring that Plan International’s MER initiatives meet the minimum standards of ethical principles
- improving the quality of the MER outcomes
- increasing the credibility of Plan International’s research and MER work with external actors

4.1 Steps that all MER initiatives must take to adhere to the minimum ethical standards

All Monitoring, Evaluation and Research initiatives must adhere to and implement the following steps:

1. A [safeguarding risk assessment](#) must be conducted before participants start to be involved.
2. Voluntary and informed consent from participants must be sought before their involvement in the MER initiative starts. Wherever possible, [please use the template information sheets and consent forms to collect consent](#).
3. Access to support mechanisms or services for participants must be made available when necessary. This includes ensuring timely referrals, in line with your office’s safeguarding protocols, to appropriate organisations that are qualified to deal with the issue, whether it might be medical, psychological, legal or a disclosure or suspicion of abuse.
4. Confidentiality and anonymity of participants and their personal data must be guaranteed.

4.2 Ethics approvals as a further step that some MER initiatives must take

The MERL Standards state that research initiatives must apply for ethical approval from a research ethics committee before data collection can start. Obtaining an ethics approval is an industry standard that increases the level of credibility of Plan International’s research.

While points 1 to 4 as listed under 4.1 need to be considered and implemented by all MER initiatives, the step to obtain ethical approval from an appropriate ethics review committee before data collection can start only applies to research initiatives. Please see the box below to learn more about Plan International’s definition of research and guidance on which initiatives must get ethics approval.

It is important to note that obtaining an ethical approval for a research initiative is only one step in the continuous and reflective approach to ethics that is embedded throughout the lifespan of a research initiative. Therefore, obtaining ethical approval from an ethics review committee is not a ‘tick-box’ exercise but a point for reflection where teams working on MER initiatives can check if the initiative is on the right track to adhere to the ethical principles or whether adjustments need to be made before data collection can start.

Research	M&E
<p>Research that involves primary data collection (qualitative, quantitative or mixed-methods) with children, adolescents or adults (who are not Plan staff) to fill a pre-identified knowledge.</p> <p>This includes, for example, but <u>is not limited to</u>:</p> <ul style="list-style-type: none"> • Action research (e.g. Youth Feminist Participatory Action in the Solomon Islands) • Formative research (e.g. Girls in Crisis research) 	<p>M&E primary data collection activities that meet at least one of the following criteria:</p> <ul style="list-style-type: none"> • Are published externally • Explore a sensitive topic (for example, violence or sexual violence) • Pose <u>at least one</u> high or very high risk (as assessed in the safeguarding risk assessment form) <p>This includes, for example, but is <u>not limited to</u>:</p> <ul style="list-style-type: none"> • A project evaluation to inform programming published on Plan’s external website • Baseline data collection that will inform an external research report

<ul style="list-style-type: none"> • Policy and advocacy research (e.g. State of the World Girls' Report: Free to be online) • Quasi-experimental research designs • Randomised Control Trials (RCTs) • Operational research <p>Exceptions are:</p> <ul style="list-style-type: none"> • Research that has received ethics approval by a university or a national ethics committee • Research that involves Plan staff members as the ONLY research participants 	<ul style="list-style-type: none"> • A monitoring data collection activity with formerly trafficked children
<p>You <u>CAN</u> still submit an ethics application even if you <u>DO NOT</u> need to: The ERT will review ethics applications for MER initiatives that do not need ethics approval, for example, if you want advice, your donor requires ethics approval or you want to publish the results externally (e.g. in an academic journal).</p>	
<p>All MER initiatives need to submit a <u>Safeguarding risk assessment</u>. This includes initiatives that <u>do not</u> need ethics approval.</p>	

An ethical approval must be obtained **only from one** of the following entities:

- local ethics review board (ERB), such as a local authority, regional government body or ministry
- a higher education institution, such as a university, college or institute of technology
- Plan International's [Ethics Review Team \(ERT\)](#).

The project manager or principle researcher must choose which ethics approval process is appropriate for their research initiative according to the following guidelines:

Local ERBs

in some countries, it is a mandatory requirement that research initiatives need to obtain ethical approval from local ERBs before commencing with data collection (a summary of national research ethics processes in 133 countries can be found [here](#)). If this is the case, you will have to comply with the ethics application procedure of the respective local ERB. Applications to local ERBs can take up to six months, therefore the process of obtaining ethics approval needs to be factored into the project timeline. The written approval that you have received from a local ERB needs to be forwarded to Plan International's ERT email address research@plan-international.org before data collection starts.

Higher education institutions

in some cases where Plan International works together with consultants or partners from higher education institutions the institution might offer an ethical approval for a research initiative through their ethics review committee or internal review board. If you choose to get an ethical approval from the higher education institution, you will have to comply with the ethics application procedure of the respective higher education institution. Applications to higher education institutions can take up to six months, therefore the process of obtaining ethics approval needs to be factored into the



project timeline. The written ethics approval that you have received from a higher education institution needs to be forwarded to Plan International's ERT email address research@plan-international.org before data collection starts.

Plan International's ERT

when an ethical approval from a local ERB or a higher education institution is not required or not available, you must apply for ethical approval from Plan International's Ethics Review Team (ERT). The ERT aims to process all ethical applications within four weeks, depending on the adjustments that might have to be made to the ethics application.

Consult the [guideline on how to apply for an ethical approval from Plan International's ERT](#) to find more information on the process of applying to Plan International's ERT.

While it is only mandatory to obtain ethical approvals for research initiatives and extraordinary M&E initiatives⁶, the ERT will accept voluntary ethics applications for monitoring and evaluation initiatives if the principal investigators see an added value for their project in doing so. You can also contact Plan International's ERT for general guidance on ethics in MER initiatives.

Regardless of which body you obtain ethical approval for a research initiative from, you always have to consult with and adhere to Plan International's MERL Standards and Policy, the framework including Plan International's ethical principles and [Plan International's Global Policy on Safeguarding Children and Young People](#).

5. RESOURCES TO SUPPORT ETHICAL MER

Ethical MER requires reflection throughout the whole MER process and the consideration of ethical issues in every step of the activity. You can find all the latest resources for ethical MER on the MERL Planet page under [MER Ethics and Safeguarding](#), including:

- [How to apply for ethics approval from Plan International's ERT](#)
- [MER Ethics Application Form ERT](#)
- [MER & Safeguarding Guidance](#)
- [MER Safeguarding Risk Assessment](#)
- [MER Ethics Briefing for External Consultants and Partners](#)
- [MER Ethics – Consent: Adult Information Sheet](#)
- [MER Ethics – Consent: Child & Adolescent Information Sheet](#)
- [MER Ethics – Consent: Parent & Guardian Information Sheet](#)
- [Collecting remote consent](#)

Other useful research guidelines can be found in the [MERL library](#).

⁶ M&E data collection activities that are published externally and are not part of the standard M&E activities that accompany a programme also fall within the framework's definition of research and therefore need to obtain ethical approval.



SAFEGUARDING IN MER

Embedding safeguarding in MER initiatives

1. INTRODUCTION

As a child-rights organisation, Plan International believes that involving children and young people in Monitoring, Evaluation and Research (MER) is important. By listening to children and young people's voices and views on issues that affect them, we can better understand their lived realities and can design stronger programmes and influencing interventions.

However, there are specific risks when involving children and young people in MER initiatives. Their participation in MER can expose them to risks of various forms of violence, abuse and exploitation before, during and after their engagement. The participation of children and young people in MER demands careful consideration of - and establishing robust measures to address – safeguarding.

Plan International's [Global Policy on Safeguarding Children and Young People](#) highlights that Plan International and anyone that represents us has a serious responsibility and duty to ensure that they do not in any way harm, abuse or commit any other act of violence against children and young people. It also emphasises that children and young people must not be placed at risk of harm by coming in to contact with any Plan International programme or intervention – including any MER initiative. While Plan International's safeguarding work puts a focus on keeping children and young people safe, it is important to remember that an ethical MER initiative requires that all participants¹ and data collectors² are being kept safe, this includes adult participants and adult data collectors. Therefore, safeguarding standards and processes set out in this document apply to research participants of all ages and data collectors.

This document expands on Plan International's [Framework for Ethical MER](#) and provides guidance on ensuring safeguarding is fully considered throughout a MER initiative. After this introduction this document includes the following sections:

- Engaging participants in MER initiatives
- Risks of harm
- Key safeguarding considerations for MER initiatives

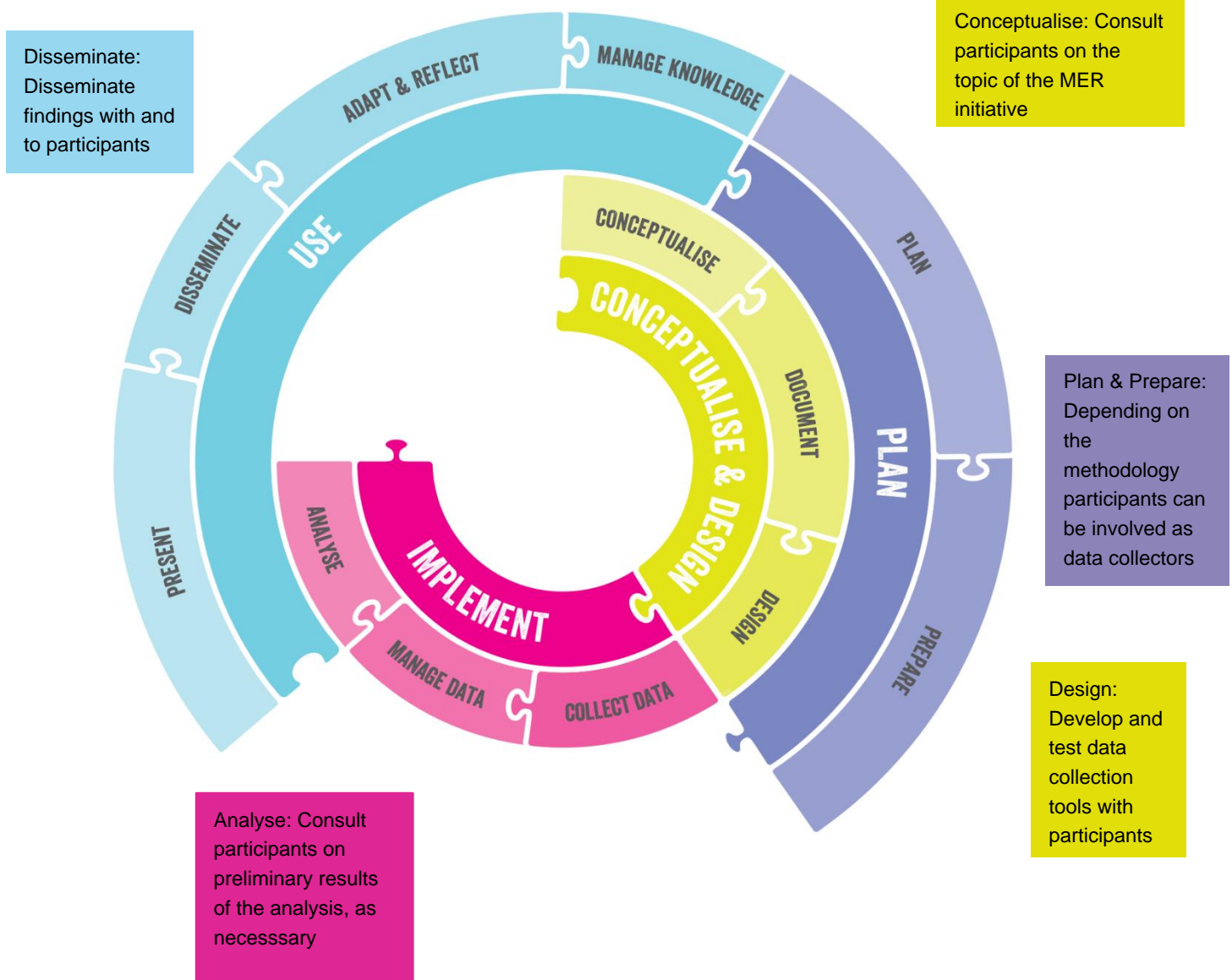
¹ Participants are all people, children and adults that we obtain data from, through information gathered directly or indirectly from the individual participating in a MER activity.

² Data collectors those who are hired by Plan International or a partner organization to collect the data (either on a voluntary or paid basis) and/or employed by Plan or a partner organization.

- Checklist

2. ENGAGING PARTICIPANTS IN MER INITIATIVES

Plan International defines ‘participants’ in MER as all people, children or adults, that we obtain data from, through information gathered directly or indirectly from the individual participating in a MER initiative. Participants can be involved at different steps of the MER initiative as shown by the examples in the graphic below. No matter at which step of the MER initiative participants are involved, appropriate safeguarding measures must be taken throughout the initiative



3. RISKS OF HARM

The risks of harm to participants can take various forms depending on the nature of your MER initiative, the activities in which you are involving participants, the topic being investigated, the local context and the level and type of engagement of the participant. It is important that these are carefully considered and that safeguarding procedures are strongly embedded into your MER initiative (see section 4).

Consider some of the following risks that might emerge during a MER initiative.³

Psychosocial harms include:

- Re-traumatisation or traumatisation because an individual has recounted painful or traumatic experiences, or has heard about such experiences, particularly if your MER initiative is investigating sensitive topics.
- Distress and anxiety caused from questions asked being upsetting, embarrassing, intrusive and/or inappropriate.
- Fear and anxiety about negative consequences of a participant's involvement or if someone finds out what they have said.
- Bullying or abuse from peers, either during the MER activity such as during a focus group, or before or after the MER activity takes place.
- Stigmatisation, humiliation and isolation if a person's participation, and details of the participation, is revealed in the community.
- Stress & fatigue as a result of participation (e.g. from travelling long distances, taking part in a long discussion).
- Distress or loss of self-esteem caused by asking children and young people information in a way that is mismatched to their current capacities and/or introducing them to new and sensitive information of which they were previously

unaware (e.g. SRHR topics such as menstruation or pregnancy).

Physical harms, including:

- Sexual exploitation and abuse perpetrated by the data collection team, including Plan International staff, volunteers, consultants or data collectors.
- Violence perpetrated by families, households or community members as retribution or punishment if a participant's information is revealed, including through a data protection breach.
- Reprisal or retribution within households if a child or young person is included or excluded from a MER initiative (missing out on any perceived benefits involved).
- Anti-social behaviour, aggression or violent attacks during participation in a MER initiative e.g. protests/ demonstrations or high crime area.
- Injury as a result of geographical hazards, such as slipping/tripping, falling, getting lost, or other risks as a result of geographic location of the MER activity.
- Travelling to and from data collection at less safe times of the day posing safety risks. Please note that data collection should never take place during dangerous times (e.g. after dark).
- Vehicle accidents, traffic problems and driving hazards during journeys to or from data collection activities.

³ Note that this is not a comprehensive list of harms, and consideration of potential risks to children and young people must be contextualized.

- Extreme temperatures – MER activities held outside during winter, heavy rain, hot temperatures.

The team working on the MER initiative must also be aware that when conducting a MER initiative, there is a heightened chance of being exposed to cases and disclosures of abuse of children and young people. The team must ensure that there are strong safeguarding measures established to address safeguarding issues, which might take the form of a safeguarding protocol document.

4. KEY SAFEGUARDING CONSIDERATIONS FOR MER INITIATIVES

Below are the eight key safeguarding steps that need to be implemented throughout the MERL process. These expand upon Plan International's [Framework for Ethical MER](#) and are in line with [Plan International's Global Policy on Safeguarding Children and Young People](#).

You should appoint a safeguarding focal point for the MER initiative. Whether that is the Plan International MER Manager, a Plan International member of the MER team, or the Plan International CO's Safeguarding Focal point, it is important that someone with adequate and up to date knowledge on safeguarding and local procedures is engaged throughout the MER initiative.

4.1 Conduct a thorough safeguarding risk assessment

Conducting a risk assessment for a MER initiative is mandatory. It is a critical step in ensuring that participants and data collectors can safely and ethically participate in the MER initiative. The purpose of the risk assessment is to map the potential risks of harm to all participants and data collectors involved in the MER initiative and to identify the appropriate measures needed to mitigate these risks.

A thorough risk assessment must be completed at the start of a MER initiative and before any engagement with participants takes place. The risk assessment should be completed and signed off by the appropriate Director⁴ at the beginning of a MER initiative. But it is important that this risk assessment is revisited throughout the initiative and is updated to document any new or changing risks.

In addition to the [safeguarding risk assessment](#), some MER initiatives also need to obtain ethical approval. This applies to research initiatives and M&E data collection activities that are published externally and are not part of the standard M&E activities.

Further resources:

- MER Safeguarding risk assessment. It's available in [English](#), [French](#) and [Spanish](#).

4.2. Assess the sensitivity of the MER initiative and respond appropriately

An initiative might be sensitive when you are: investigating a sensitive topic such as violence, sexual and reproductive health or a 'taboo' topic; asking personal and sensitive questions; working with vulnerable participants; and/or conducting a MER initiative in a humanitarian setting.

The sensitivity of an investigation must be carefully considered from the outset through consulting local staff, experts and, sometimes, children, young people and communities. In response, you must adapt your MER tools and processes to reduce the risks of distress, traumatisation and harm. For example, if you are doing research on sensitive topics such as sexual violence then doing online surveys is not appropriate.

For particularly sensitive research with vulnerable participants we recommend to plan and budget for professional psychosocial support from individuals who are appropriately qualified to provide support to participants. You must be prepared to arrange ongoing support to participants throughout the MER

⁴ National Director for National Offices, Country Director for Country Offices, Regional Director for Regional Offices, Leadership Team Member for the Global Hub. On occasions where it is not possible to get sign-off from Directors, sign-off from Heads of departments or teams is acceptable.

initiative if it is needed. In some cases, psychosocial support should be on site to immediately respond to participants in distress. As far as possible these personnel must be gender balanced to provide appropriate support.

4.3. Recruiting, onboarding and managing external consultants, partners, MER teams and translators/interpreters

You must ensure all safeguarding requirements in Plan International's [Global Policy on Safeguarding Children and Young People](#) are followed when working with external consultants, partners and translators/interpreters. The minimum standards below need to be implemented:

- All staff and stakeholders involved in the MER initiative should undergo vetting and appropriate background and police checks.
- When data is collected from children and young people, all data collectors should have experience and knowledge about working with children and young people, particularly if investigating a sensitive topic.
- All external and temporary staff need to be thoroughly briefed on [Plan International's Global Policy on Safeguarding Children and Young People](#) and the Code of Conduct (see Annex 1 of the policy document).
- All external and temporary staff must confirm that they have read and agreed to the terms of [Plan International's Global Policy on Safeguarding Children and Young People](#) by signing the Code of Conduct which is in Annex 1 of the Policy document.
- External partners and consultants must complete the online safeguarding training module on Plan Academy. It's available in [English](#), [French](#) and [Spanish](#).
- For MER initiatives involving primary data collection, it is the responsibility of the MER initiative lead or supervisors to ensure that all MER consultants and/or data collectors are thoroughly trained on [Plan International's Global Policy on Safeguarding Children and Young People](#) and the [Framework for Ethical MER](#). This includes conducting training which engages MER teams to critically reflect on the ethical considerations specific to the MER initiative

Gender considerations must be made in the allocation of data collectors. Those who are collecting data from participants should, if possible, be of the same gender as participants. This is important in reducing power dynamics and ensuring that participants feel safe and comfortable to share their experiences. For example, when conducting interviews with adolescent girls about SRHR topics, it is advisable to hire female data collectors.

For MER initiatives involving primary data collection, it is the responsibility of the MER initiative lead or supervisors to ensure that all MER consultants and/or data collectors are thoroughly trained on [Plan International's Global Policy on Safeguarding Children and Young People](#) and the [Framework for Ethical MER](#). This includes conducting training which engages MER teams to critically reflect on the ethical considerations specific to the MER initiative.

Further resources:

- External partners and consultants must complete the online safeguarding training module on Plan Academy. It's available in [English](#), [French](#) and [Spanish](#).
- A template Power Point Presentation for briefing external consultants or partners on ethical MER. It's available in [English](#).
- A template Power Point Presentation to introduce Plan International staff to ethical MER. It's available in [English](#).
- Guidance on working with translators/interpreters. It's available in [English](#) and [French](#)
- Guidance on Working with consultants. Its available in [English](#), [French](#) and [Spanish](#).
- Guidance on Training Data Collectors. Its available in [English](#), [French](#) and [Spanish](#).

4.4. Make information about local protection mechanisms available to MER initiative team and participants

It is important that you carry out a mapping, or use an existing up-to-date mapping, which identifies the protection mechanisms and other sources of support that exist in the local area and are

accessible to the team working on the MER initiative and the participants. Accessible information about key mechanisms – including services, hotlines or shelters – must be shared with participants during the informed consent process, so that they are aware of where to go if they need support should they need it. Participants should be reminded of these mechanisms throughout their engagement. Based on the risk assessment, it might be important in some cases to provide a written document with information on key agencies and resources to consult.

4.5. Obtain voluntary, informed consent from MER participants

Participants must be given appropriate information about the purpose, methods and intended use of the MER initiative; what their participation involves; and what risks and benefits are involved.

These points must be communicated in an appropriate and accessible way, considering gender, age and ability. It is important that power dynamics between the participants and MER team member are considered when informed consent is obtained, and efforts to reduce these power dynamics are made. Children and young people must be given the option to withdraw their participation at any stage of the MER activity without facing repercussions or disadvantages.

As explained under Plan International's ethical principle 5, where the participant is under 18, Plan International first seeks the appropriate consent of the participants' parent or guardian⁵. However, in some situations there may be exceptions to this rule due to local context or the situation that the young person is in. Exceptional cases must be guided and assessed by local staff and safeguarding focal points, and consent processes will need to be adapted accordingly to ensure children and young people's safe and ethical participation.

Consent for monitoring initiatives

Monitoring initiatives need to collect voluntary and informed consent from participants as well. In order to collect consent for ongoing monitoring activities a suitable approach might be to collect voluntary and informed consent at the beginning of the monitoring initiative to cover the various waves of data collection throughout the monitoring initiative. This would also involve reiterating at multiple points throughout the project that this consent can be withdrawn etc and ensuring that consent is re-sought if any changes are made (for example, to how participant's data will be used).

Further resources:

- Use the template *information sheets and consent forms* which cover all information you are required to communicate to participants when collecting their consent.
 - for participants under the age of 18. It's available in [English](#), [French](#) and [Spanish](#)
 - for parents/guardians. It's available in [English](#), [French](#) and [Spanish](#).
 - for adult participants. It's available in [English](#), [French](#) and [Spanish](#)
 - for remote consent. It's available in [English](#), [French](#) and [Spanish](#).

4.6. Create a safe and inclusive setting to conduct MER activities

MER activities should always take place in a location that is: gender-sensitive, child and youth-friendly (if working with children and young people), convenient, private and safe. Participants should feel comfortable and secure in their surroundings and safe to share their stories, experiences and opinions. Staff must also consider how inclusive the setting is, and whether it is accessible and appropriate for participants with disabilities.

For children/adolescents, it might be important that you select a space where adults (parents, caregivers, teachers) can see but not hear the discussions. However, do make sure you are always in sight of other colleagues and adults, never ever conduct an interview alone with a child.

⁵ This principle is also set out in Plan International's Data Privacy Policy as well as the MERL Standards.

During focus group discussions, you should consider separating the groups by sex, age and other variables in order to reduce possible harmful power dynamics so that respondents feel safe and comfortable in expressing their views. This extends to the data collection teams: it is recommended that for interviews the data collector is of the same sex as the respondent or that in case of a mixed sex focus group discussion, the data collectors are gender balanced. It is also important that data collectors are close in age to the respondents to avoid harmful power dynamics based on age.

Creating a safe setting also extends to the journeys to or from the venue for MER activities. The MER team must ensure that journeys are safe, for example by ensuring that participants and data collectors travel during safe times of the day. Children and young people may need to be accompanied by adults and transport may need to be organised.

It is also important to take practical steps to ensure that the data collection does not exclude certain groups. This includes, among others, carefully considering the timing and location of the data collection or providing support for participants with care responsibilities.

Please refer to the following guidelines for more detailed and specific considerations for conducting focus group discussions, key informant interviews and surveys:

- Developing and conducting focus group discussions. [It's available in English, French and Spanish](#)
- Developing and conducting interviews. [It's available in English, French and Spanish](#)
- Developing and conducting surveys. [It's available in English, French and Spanish](#)

4.7. Ensure duty of care and report and respond to safeguarding concerns

The MER team must be aware that whilst conducting a MER initiative, there is a heightened chance of being exposed to cases and disclosures of child abuse. In circumstances where an alleged incident of historical or current abuse of a child or young person abuse is revealed during data collection Plan International's duty of care overwrites Plan International's pledge to confidentiality towards the participants.

Before the data collection begins, it is important that participants are told that Plan International has the duty to report concerns or disclosures of abuse and that this limits the participants confidentiality. Participants need to be able to make an informed decision about whether they would like to take part under these circumstances. If information about abuse is disclosed, data collectors should discuss with participants what action they will take next (e.g. report the abuse to Plan International's safeguarding focal point, report the abuse to a local authority)

You should have an agreed upon and thorough plan for reporting and responding to child and youth safeguarding issues which emerge during the MER initiative, in line with the Country Office's reporting procedures. This should take the form of a Safeguarding Referral Protocol that is established before data collection starts.

Before data collection starts, each data collector must understand and be trained on the following topics:

- which safeguarding concerns should be reported?
- when must the safeguarding concern be reported?
- who should the safeguarding concern be reported to?

Which information should be given to the participant who has disclosed the safeguarding concern? There must be capacity within the Plan International office to respond to and manage any safeguarding concerns that arise in a timely, sensitive and appropriate manner for the duration of the MER initiative.

Further resources:

- To make a safeguarding report, use Plan International's [incident notification form](#) and send it to Incident-Loss.Notification@plan-international.org

- [Read about your responsibilities in reporting a safeguarding concern](#)
- [A list of Safeguarding Focal Points in Plan International Offices](#)

4.8. Secure handling and retention of personal data and safeguarding disclosures

Any loss of a participant's personal data may constitute a safeguarding risk and should be reported to the relevant safeguarding focal point. The safe handling and storage of personal data is especially important where notes or reports of allegations of abuse are recorded. Practical arrangements should be made to ensure the security of these files (including a secure filing cabinet, password protected electronic files etc.) The transfer of safeguarding disclosures verbally must be done in a way that confidentiality is maintained (for example, conversations should take place in a space where no one else can hear the conversation)

All external parties – whether research partners, consultants, enumerators or contractors (including translation/interpretation services) - must return all data (hard and soft copies and any notes) to Plan International. All copies of this data held by external parties must be destroyed. Arrangements for this must be agreed in contracts with external parties.

All staff should be aware of how long records must be stored for, as in some instances records containing safeguarding issues may need to be retained for longer periods of time. When records are no longer needed destruction of all records should be done in an appropriate manner – i.e. through shredding and not recycling.

Further resources:

- [Data Privacy Policy](#)
- [Data Retention Policy](#).

For more resources on safeguarding, please visit the [Planet site](#) for Safeguarding Children and Young People.

5. CHECKLIST

You can use [this checklist](#) is intended as a helpful tool to help guide you as you undertake your initiative. It is not mandatory but using it alongside this guidance will support you in embedding safeguarding throughout your MER initiative.