Policy name: Safeguarding Policy
Responsible unit: Global Award Management
Responsible person: Senior Contracts & Grants Manager
Effective date: 20 January 2017 (formerly Children, Youth, and Vulnerable Adults Protection Policy)
Last updated: 24 February 2020

Applies to:
☒ All offices
☐ All offices other than Ipas NC
☐ Ipas NC only

Purpose
The purpose of this policy is to protect people, particularly children, at-risk adults, and beneficiaries from harm that may be caused due to their contact with Ipas. This includes harm arising from:

• The conduct of Ipas employees or representatives; and
• The design and implementation of Ipas’s programs and activities

Ipas is committed to ensuring that everyone within the organization accepts their responsibility for safeguarding. This means following procedures to protect children and at-risk adults, and reporting any concerns about their welfare to the appropriate authorities. Specifically, Ipas works to:

• Prevent child and/or at-risk adult abuse
• Report child and/or at-risk adult abuse
• Respond to child and/or at-risk adult abuse
• Provide training to promote awareness of safeguarding obligations

This policy lays out Ipas’s commitments and informs Ipas employees and representatives of their safeguarding responsibilities.

Definitions

Abuse: Intentional injury or harm, including regular or repeated physical, emotional, or sexual harm, injury, or neglect. All sexual activity between an adult and a child is considered sexual abuse.

At-risk adult: Any person 18 or older who is systematically under-advantaged or stigmatized in a given community or context. This includes but is not limited to those who identify with a particular race, ethnicity, sex, gender expression, sexual orientation, disability status, religion, nationality, or marital status.

Beneficiary: Target group member(s) who directly or indirectly receive a benefit from Ipas programs.

Child: Any person age 0-17.

Exploitation: Abuse where compensation is involved or perpetrators benefit monetarily, socially, or politically. Exploitation is a form of coercion and violence.
Inappropriate behavior: Inappropriate behavior can be described as but is not limited to unwanted comments or advances of sexual or socially unacceptable nature, use of photographs and videos without the consent of those depicted, harassment, touching, discrimination, sexual assault, stalking, etc.

Ipas representatives: Non-employees and other entities who are acting or could reasonably be understood by others to be acting as agents of Ipas. Ipas representatives include Ipas’s independent contractors or consultants, suppliers, subawardees, partners, agents, interns, volunteers, and Board members.

Neglect: Failure to provide basic needs either physical (nutrition, clothing, shelter, health care, protection from harm, etc.) or emotional (care, education, security, affection, etc.).

Sexual assault: Sexual activity with another person who does not, or is not able to, explicitly consent to the activity. This includes rape and any sexual activity committed by force or violence. An individual may not be able to consent due to their age, incapacitation, the power dynamics present in the relationship, coercion, or the threat of force or violence.

Responsibilities
All Ipas employees and representatives are obliged to comply with this Safeguarding Policy and to contribute to creating and maintaining an environment that prevents and addresses safeguarding violations.

Policy Statement
Ipas recognizes that the welfare and interests of children and at-risk adults are paramount in all circumstances. Therefore, it maintains a zero-tolerance policy toward abuse, exploitation, trafficking, inappropriate behavior with, or neglect of children or at-risk adults. Ipas commits to protecting children and at-risk adults with whom we work, including Ipas vendors, partners, beneficiaries and those with whom we work indirectly.

A. Child safeguarding
Ipas staff and representatives must not:
• Engage in sexual activity with anyone under the age of 18, including in contexts where citizens reach legal adulthood before 18;
• Sexually abuse and/or assault or exploit children;
• Physically, emotionally, or psychologically abuse or neglect a child;

B. At-risk adult safeguarding
Ipas staff and representatives must not:
• Sexually abuse or exploit at-risk adults;
• Subject an at-risk adult to physical, emotional, or psychological abuse, or neglect.

C. Protection from sexual exploitation and abuse
Ipas staff and representatives must not:
• Exchange money, employment, goods, or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance;
• Engage in any sexual relationships with beneficiaries, since such relationships are based on inherently unequal power dynamics.

D. Reporting
• Ipas staff and associated personnel are obliged to report any concerns or suspicions regarding safeguarding violations by an Ipas employee or representatives in compliance with Ipas’s Ethics Hotline Policy.
• Safeguarding concerns or complaints must be reported through Ipas’s ethics hotline as described in Ipas’s Ethics Hotline Policy and Hotline Reporting and Investigations Procedures.
• The ethics hotline is open to external sources such as members of the public and partners.

References
• Anti-Slavery and Anti-Trafficking Policy. This policy sets out Ipas’s obligations and responsibilities for its business operations and that of its representatives in preventing slavery, human trafficking, and forced labor.
• Code of Business Ethics and Conduct and Ethics Hotline Policy. These outline Ipas’s standards of conduct and misconduct allegation reporting requirements to support compliance with legal, ethical, and other requirements that govern Ipas programs and business operations.
• Hotline Reporting and Investigations Procedure. This procedure describes how to report concerns of misconduct in accordance with this policy and how Ipas manages investigations.
• Investigations Policy. This policy guides Ipas’s actions after a hotline report is made.
• Photography and Images Policy and Procedure. These guide Ipas’s actions for using images in published materials.