

RÉSEAU DES FEMMES LEADERS POUR LE DÉVELOPPEMENT

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Safeguarding & PSEAH Policy

Protection from Sexual Exploitation, Abuse and Harassment — pan-African feminist standards for RFLD and all partners

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1. Commitment Statement and RFLD's Safeguarding Mandate

1.1 Who RFLD Is and Why Safeguarding Is Central

RFLD — Réseau des Femmes Leaders pour le Développement — was founded in 2013 as a pan-African feminist intermediary. Our mandate is the advancement of women's rights, sexual and reproductive health and rights (SRHR), civic space, and climate justice across the African continent. We work with Women Human Rights Defenders (WHRDs), environmental activists, community organisers, journalists, and the most marginalised women and girls across 15+ countries.

The people RFLD serves are not abstract beneficiaries — they are the women on whose behalf RFLD carries the title 'feminist organisation.' They are women who already face disproportionate exposure to violence, exploitation, surveillance, and silencing. When RFLD operates in their communities, at their events, through their partner organisations, we bring with us not only resources and support but also power — institutional, relational, and financial. With that power comes an absolute responsibility to ensure it is never weaponised, even inadvertently, against the people we are here to serve.

This Safeguarding and PSEAH Policy is therefore not a compliance document. It is a statement of who RFLD is, expressed in concrete, enforceable operational standards. Safeguarding is not a department, a form, or a training module — it is the lived practice of every person who acts under RFLD's name, every day, in every country.

1.2 RFLD's Zero-Tolerance Commitment

RFLD has a zero-tolerance position on all forms of sexual exploitation, abuse, harassment, and any other harm caused to beneficiaries, community members, partners, or staff by persons acting on RFLD's behalf. This zero-tolerance position means:

- There are no exceptions based on seniority, length of service, cultural context, personal circumstances, or operational pressure.
- Any substantiated violation results in immediate termination of employment or engagement and referral to relevant authorities where evidence supports it.
- The survivor's safety, dignity, and wellbeing take priority over institutional reputation, programme continuity, or the career of any Covered Person.
- Every person who witnesses, suspects, or learns of a safeguarding violation has a personal and non-delegable obligation to report it.

⚠ EMERGENCY SAFEGUARDING CONTACTS — AVAILABLE 24/7: Safeguarding Email: integrity@rflgd.org Cotonou HQ (Benin): +229 01 50 02 46 19 Accra (Ghana): +233 53 496 8866 Dakar (Senegal): +221 77 541 84 37 Banjul (Gambia): +229 01 50 02 46 19 (via HQ) Secure Online Report Form: rflgd.org/rfld-internal-policies/ IF A PERSON IS IN IMMEDIATE PHYSICAL DANGER — CONTACT NATIONAL EMERGENCY SERVICES FIRST

1.3 Sources of Obligation

RFLD's safeguarding obligations arise from multiple reinforcing sources:

Source	Key Requirement
Sida (Sweden) — NAFASI Grant Agreement 2026–2029	PSEAH is a mandatory programme standard. Sida requires: a written PSEAH policy; designated Safeguarding Focal Points; mandatory reporting of PSEAH incidents; evidence of training; and survivor-centred response protocols.
GIZ/BMZ — SEA-T Cohort 2025–2028	RFLD must demonstrate active PSEAH compliance as a condition of cohort membership and as part of the annual performance review.
UN Inter-Agency Standing Committee (IASC) PSEAH Framework	The IASC framework provides the international humanitarian and development standard for prevention and response to sexual exploitation and abuse, which RFLD adopts as its baseline.
Keeping Children Safe — International Standard	RFLD adheres to the Keeping Children Safe international standards on safeguarding in international development and humanitarian response, including safe programming, safe recruitment, and incident management.

Source	Key Requirement
National Law — all RFLD countries of operation	The criminal law of Benin, Ghana, Senegal, The Gambia, and each programme country applies — including laws on sexual offences, child protection, and mandatory reporting obligations.
RFLD's Feminist Values and Accountability to Beneficiaries	As a feminist organisation, RFLD is accountable to the women and communities it serves. This is the deepest and most fundamental source of RFLD's safeguarding commitment.

1.4 Relationship to Other RFLD Policies

This Policy operates alongside:

- RFLD Anti-Corruption & Conflict of Interest Policy (RFLD-POL-ACOI-v1.0) — sexual exploitation linked to aid delivery is a zero-tolerance integrity violation under both policies simultaneously.
- RFLD HR Policy (RFLD-POL-HR-v1.0) — disciplinary procedures and employment protections that give effect to safeguarding sanctions.
- RFLD Data Protection Policy (RFLD-POL-DPP-v1.0) — governing the security of survivor data and other sensitive safeguarding information.
- RFLD Sub-Granting & Partner Management Policy (RFLD-POL-SGP-v1.0) — governing safeguarding requirements for implementing partners.
- RFLD Risk Management Policy (RFLD-POL-RISK-v1.0) — safeguarding risk is a mandatory category in RFLD's organisational risk register.

2. Scope of Application

2.1 Personal Scope

This Policy applies to all of the following ('Covered Persons'), regardless of whether they are paid, whether they are in an RFLD office, or which country they are based in:

- All permanent, fixed-term, part-time, and probationary employees of RFLD in all offices and locations.
- All Board members and members of any Board committee.
- All consultants, advisers, and independent contractors engaged by RFLD.
- All volunteers, interns, fellows, and secondees working under RFLD's name or with RFLD resources.
- All implementing partners, sub-grantees, and member organisations of RFLD's WAFF Fund — to the extent specified in their sub-grant agreements and the PSEAH obligations in Section 14.
- All suppliers and service providers engaged for field activities or any activity involving direct or indirect contact with beneficiaries or communities.
- Any individual representing RFLD at any event, meeting, or field activity.

2.2 Geographical Scope

This Policy applies wherever RFLD operates: at all four RFLD offices (Cotonou, Accra, Dakar, Banjul); at all field programme locations across RFLD's 15+ countries of active delivery including Mali, Burkina Faso, Niger, Côte d'Ivoire, Senegal, Ghana, Nigeria, and others; at RFLD-organised events, workshops, training sessions, and consultations; and in online and remote-working contexts. There is no geography-based exception to this Policy.

2.3 Who Is Protected

This Policy protects:

- All programme beneficiaries, programme participants, and community members who come into contact with RFLD's work — including WHRDs, activists, SRHR clients, youth participants, and environmental defenders.
- All RFLD staff — who have the right to work in an environment free from sexual harassment and any other form of harm.
- All children and young people under 18 who interact with RFLD in any context.
- All persons in vulnerable circumstances — regardless of age — including individuals with disabilities, those in acute crisis situations, and those in fragile or conflict-affected environments.

3. Key Definitions

Term	Definition
Sexual Exploitation	Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes — including gaining monetary, social, or political advantage through the sexual exploitation of another person. Sexual exploitation includes the exchange of sexual access for aid, services, programme benefits, or any other resource — even where both parties appear to consent, given the inherent power imbalance.
Sexual Abuse	The actual or threatened physical intrusion of a sexual nature by force, under coercive conditions, or through an abuse of authority — including unwanted touching, penetration, and any other unwanted physical sexual contact. Consent given under conditions of duress, power imbalance, or material dependency is not valid consent.
Sexual Harassment	Any unwelcome conduct of a sexual nature — verbal, non-verbal, digital, or physical — that creates a hostile, intimidating, or offensive working environment, or that is made explicitly or implicitly a condition of employment, programme participation, or access to resources. Sexual harassment applies equally between colleagues of any gender.
Child	Any person under the age of 18. This definition applies regardless of local national law on the age of majority or consent. There are no exceptions. All sexual activity involving a child is prohibited regardless of apparent consent.
Safeguarding	The proactive duty of RFLD to prevent harm to beneficiaries, community members, partners, and staff that could arise from RFLD's activities, RFLD's inaction, or the conduct of RFLD's personnel. Safeguarding is preventive as well as responsive.
PSEAH	Protection from Sexual Exploitation, Abuse and Harassment — the sector-wide framework, aligned with the UN IASC standard, governing the prevention of, and response to, sexual exploitation, abuse, and harassment in aid and development settings.
Safeguarding Focal Point (SFP)	The designated RFLD staff member at each office responsible for receiving safeguarding concerns, providing immediate support to reporters and survivors, escalating to the Ethics Committee, and acting as the first point of contact for all safeguarding matters in their location.
Survivor	Any person who has experienced sexual exploitation, abuse, harassment, or any other harm as defined in this Policy. RFLD uses 'survivor' rather than 'victim' to emphasise agency, strength, and recovery.
Perpetrator	Any person who has committed an act of sexual exploitation, abuse, harassment, or other safeguarding violation, whether or not a formal finding has been made.
Survivor-Centred Approach	An approach to responding to safeguarding incidents that prioritises the survivor's immediate safety, dignity, and wellbeing above institutional interests, operational continuity, or reputational concerns. The survivor's wishes and preferences guide response decisions to the greatest extent possible.
Technology-Facilitated Gender-Based Violence (TFGBV)	Any act of violence or abuse that is perpetrated using digital technology — including non-consensual sharing of intimate images, online harassment campaigns, digital stalking, doxxing, deepfake sexual content, and the use of spyware or surveillance tools to monitor or control a person.
Harm	Any physical, emotional, psychological, digital, or sexual injury or damage caused to a person as a result of another person's actions or omissions in connection with RFLD activities.
Code of Conduct	The specific behavioural standards set out in Annex V, which all Covered Persons must read, understand, and sign before undertaking any RFLD activity involving contact with beneficiaries or communities.

4. Prohibited Conduct — Detailed Standards

4.1 Sexual Exploitation — Absolute Prohibitions

The following conduct is absolutely prohibited. There are no mitigating circumstances, no cultural or contextual exceptions, and no level of seniority that creates an exemption:

- Engaging in, attempting to engage in, or facilitating sexual activity with a beneficiary, programme participant, or community member — regardless of apparent consent, given the power imbalance inherent in the relationship between an aid provider and those they serve.
- Exchanging money, employment, goods, services, programme assistance, access to resources, favourable treatment, or any other benefit in return for sexual access to any person, including beneficiaries.
- Making sexual access a condition — explicit or implicit, direct or indirect — of receiving programme support, employment, referral, or any other RFLD benefit.
- Using RFLD's institutional relationships, name, or resources to facilitate the sexual exploitation of any person by any third party.
- Transactional sexual relationships — relationships in which sexual access is exchanged for any material advantage — with programme participants or community members, regardless of whether programme resources are directly involved.

4.2 Sexual Abuse — Absolute Prohibitions

- Any unwanted sexual touching, penetration, or physical sexual contact with any person.
- Threatening or coercing any person into any form of sexual activity.
- Sexual assault of any kind — including rape, attempted rape, and sexual battery.
- Causing or permitting any child under 18 to be subjected to any sexual activity, regardless of apparent consent.
- Non-consensual exposure — forcing a person to view sexual material or to be present at a sexual act without their consent.

4.3 Sexual Harassment in the Workplace and Programme Settings

Sexual harassment is prohibited in RFLD workplaces, at RFLD events, during field activities, in online communications, and in any other context connected to RFLD. Sexual harassment includes but is not limited to:

- Unwanted verbal conduct of a sexual nature — sexual comments, jokes, innuendo, propositions, questions about a person's body or sexual life.
- Unwanted non-verbal conduct of a sexual nature — sexually suggestive gestures, displaying or sharing sexually explicit material in shared spaces or communications.
- Unwanted physical conduct of a sexual nature — unnecessary touching, brushing against a person's body, blocking movement in a sexually threatening manner.
- Conduct on digital platforms — sending unsolicited sexual messages, images, or videos; making sexual comments on professional social media; using digital platforms to harass.
- Creating, contributing to, or failing to address a working environment where sexual jokes, comments, or attitudes are normalised.
- Making any employment, promotion, programme allocation, or benefit decision in a way that rewards or punishes a person based on their response to sexual advances.

4.4 Other Prohibited Conduct

In addition to sexual exploitation, abuse, and harassment, the following conduct is prohibited under this Policy:

- Physical violence of any kind against any person in connection with RFLD activities.
- Psychological or emotional abuse — including intimidation, humiliation, deliberate isolation, verbal aggression, or any other conduct designed to degrade or control a person.
- Discrimination or harassment on grounds of gender, gender identity, sexual orientation, ethnicity, disability, religion, age, or any other protected characteristic.

- Conduct that exposes beneficiaries, WHRDs, or programme participants to safety risks through careless or reckless handling of personal data, location information, or programme records.
- Any form of contact with beneficiaries or community members that is personal, sexual, or romantic in nature and that exploits the relationship created by RFLD's work.

4.5 Consensual Relationships — Policy Guidance

While this Policy does not prohibit all personal relationships between RFLD staff, it establishes the following governance framework for relationships that could create conflicts of interest or safeguarding risks:

- Relationships between a supervisor and a direct report must be disclosed immediately to the Finance Manager. RFLD will manage the potential power imbalance through reassignment of supervisory responsibility.
- Romantic or sexual relationships between RFLD staff and current programme beneficiaries, community members in programme areas, or representatives of current partner organisations are strongly discouraged and must be disclosed. RFLD will assess the power dynamics and manage accordingly.
- Any relationship that involves a power imbalance that the less powerful party cannot freely exit is not genuinely consensual — and may constitute exploitation under Section 4.1.

5. Specific Protections for Children and Young People

5.1 The Absolute Child Protection Standard

RFLD applies the highest possible standard of protection to all children and young people under the age of 18 who interact with RFLD in any context. This standard is absolute — it applies regardless of local national law on the age of consent, regardless of any claim of consent by the child, and regardless of the cultural context in which the interaction occurs. No exception exists.

5.2 Prohibited Conduct Involving Children

- Any sexual activity with, or sexual conduct towards, a person under 18.
- Accessing, distributing, producing, or possessing child sexual abuse material (CSAM) in any format.
- Using RFLD activities, premises, relationships, or digital platforms to access, contact, or groom children for any purpose.
- Being alone with a child in a private setting without an additional adult present and without parental or guardian consent — the 'two-adult rule' applies in all programme contexts.
- Photographing, filming, or recording children — in person or online — without the explicit written consent of the child's parent or legal guardian and prior written approval from RFLD's Safeguarding Focal Point.
- Sharing or publishing any photograph, image, video, or identifiable information about a child without parental/guardian consent and SFP approval.
- Giving gifts, money, or any benefit directly to a child without parental/guardian knowledge and SFP authorisation.
- Inviting a child to one's personal home without parental/guardian consent, presence, and SFP knowledge.

5.3 Youth Programmes — Heightened Standards

RFLD's NAFASI programme and other activities reach youth under 18 through the African Changemakers MeetUp and other youth engagement activities. The following heightened standards apply to all youth programming:

- All staff and volunteers interacting with youth must have completed safeguarding induction and the Code of Conduct (Annex V) before the activity.
- A Safeguarding Risk Assessment (Annex IV) must be completed before every youth activity and submitted to the Safeguarding Focal Point for approval.
- A minimum of two RFLD-affiliated adults must be present at all times during youth activities.
- A dedicated safeguarding contact for the activity must be identified, briefed, and introduced to participants and their guardians before the activity begins.
- Parental or guardian consent must be obtained in writing for youth under 16 for all RFLD programme activities.
- Youth feedback mechanisms — age-appropriate, non-threatening, multilingual — must be available at all youth programme activities.

5.4 Child Safeguarding in RFLD's Digital Security Work

RFLD's NAFASI programme involves digital rights training, digital security workshops, and helpline services. These activities may engage youth activists and young human rights defenders. In these contexts:

- All digital platforms and tools used in youth-facing activities must be vetted for child-safe design by the RFLD digital security team.
- No youth participant's personal data — including contact details, location, or identity — may be stored in systems accessible to programme partners without parental consent and SFP approval.
- Online activities involving youth must be conducted through vetted, secure, age-appropriate platforms only.

6. Technology-Facilitated Gender-Based Violence (TFGBV)

6.1 Why TFGBV Requires Specific Policy Provisions

RFLD's NAFASI programme explicitly addresses the reality that Technology-Facilitated Gender-Based Violence is not a side effect of digital authoritarianism but one of its most precise instruments. State actors, political opponents, corporate interests, and private individuals use digital tools to harass, silence, surveil, and control women human rights defenders, activists, and journalists across Africa. In this environment, RFLD has both a programmatic responsibility to counter TFGBV and an internal responsibility to ensure RFLD's own digital operations do not expose beneficiaries to TFGBV risk.

6.2 Forms of TFGBV Addressed by This Policy

Form of TFGBV	Description and RFLD's Position
Non-consensual image sharing	The sharing, distributing, or publishing of intimate or sexual images of a person without their consent (sometimes called 'revenge porn'). Absolutely prohibited for Covered Persons. RFLD will support beneficiaries affected.
Online harassment campaigns	Coordinated campaigns of threats, insults, doxxing, or other harmful content targeting individuals online — often women, LGBTQ+ individuals, and activists. RFLD will not tolerate staff participation and will support targets.
Doxxing	Publishing private personal information — home address, phone number, family members' names — to expose a person to harm. Prohibited for all Covered Persons. RFLD protects beneficiary data accordingly.
Deepfake sexual content	Creating, distributing, or using AI-generated or digitally manipulated sexual images of a real person without their consent. Absolutely prohibited; treated as equivalent to sexual abuse under this Policy.
Digital stalking and surveillance	Using tracking software, location data, or social media monitoring to monitor or control a person's movements, communications, or behaviour without consent. Prohibited for Covered Persons; RFLD protects beneficiary digital safety.
Cyberflashing	Sending unsolicited sexual images or messages via digital platforms. Prohibited under the sexual harassment provisions of Section 4.3.
Spyware-facilitated harassment	Use of commercial spyware (Pegasus, Predator, or equivalent) to intercept a person's communications for the purpose of harassment or control. RFLD's NAFASI digital security work directly counters this; internal use of surveillance tools against beneficiaries or staff is absolutely prohibited.

6.3 RFLD's Internal TFGBV Prevention Obligations

To ensure RFLD's own operations do not facilitate TFGBV, the following obligations apply to all Covered Persons:

- Do not photograph, record, or screen-capture any RFLD beneficiary, workshop participant, or community member for personal use without explicit consent.
- Do not share any image, video, or voice recording of a beneficiary on personal social media or communications platforms without written consent.
- Do not use RFLD's digital security tools — VPN, encrypted communications, data compendium — to monitor the activities of any beneficiary, community member, or colleague without authorisation.
- Report any suspected TFGBV affecting a beneficiary or colleague immediately to the Safeguarding Focal Point.

6.4 RFLD's Support for TFGBV Survivors

Where a beneficiary, programme participant, or RFLD staff member reports TFGBV, RFLD will:

- Activate the survivor-centred response framework in Section 10.
- Connect the survivor to RFLD's NAFASI digital security helpline for emergency digital security support, including device security assessment, account recovery, and evidence preservation.

- Provide or facilitate referral to legal, psychological, and safety support appropriate to the specific form of TFGBV experienced.
- Where the TFGBV involves a state actor or organised campaign, escalate through RFLD's ACHPR Observer Status mechanisms and NAFASI advocacy channels.

7. Safeguarding Focal Points — Roles, Contacts, and Responsibilities

7.1 Purpose and Designation

Each RFLD office has a designated Safeguarding Focal Point (SFP) who serves as the first point of contact for all safeguarding concerns in their location. The SFP is not an investigator — they are a trusted, trained, and confidential first responder who receives concerns, provides immediate support to reporters and survivors, activates the response protocol, and escalates to the Ethics Committee. The SFP role is a formal designation requiring specific training and is included in the position description of the designated staff member.

7.2 Safeguarding Focal Point Contacts

Office	Email	Phone	Address
Cotonou HQ (Benin)	integrity@rflgd.org	+229 01 50 02 46 19	Hounsa, Rue de l'Université Agricole, Porto-Novo / Cotonou, Benin — Headquarters · Francophone Hub
Accra (Ghana)	integrity@rflgd.org	+233 53 496 8866	Nmai Dzorn, Adjiringano Rd, Eden Court, Accra, Ghana — Regional Hub · Anglophone Operations
Dakar (Senegal)	integrity@rflgd.org	+221 77 541 84 37	5ème et 6ème étage, Immeuble Cité Keur Gorgui, Dakar, Sénégal — Sahel Programmes · Francophone West Africa
Banjul (Gambia)	integrity@rflgd.org	+229 01 50 02 46 19 (via HQ)	Banjul, The Gambia — ACHPR Liaison Office

7.3 Responsibilities of the Safeguarding Focal Point

The SFP carries the following responsibilities in their office location:

- Receive and log all safeguarding concerns reported to them — whether formal or informal, verbal or written.
- Provide immediate, non-judgmental support to the person reporting the concern — including information about options, rights, and support resources.
- Ensure the immediate safety of any survivor or person at risk — including facilitating separation from the alleged perpetrator and connecting to medical or emergency services if needed.
- Notify the Executive Director within 4 hours of receiving any report of sexual exploitation or abuse involving a beneficiary or child.
- Escalate all reports to the Ethics Committee at integrity@rflgd.org within 24 hours, using the Safeguarding Incident Report Form (Annex I).
- Maintain strict confidentiality — the identity of the reporter and the survivor is protected unless the survivor consents to disclosure or legal mandatory reporting applies.
- Complete the Safeguarding Risk Assessment (Annex IV) for all new programme activities involving direct beneficiary contact.
- Attend quarterly SFP network meetings to share learning, review cases, and update risk assessments.
- Complete annual advanced PSEAH training.

7.4 Supporting the SFP — Ethics Committee Oversight

The SFP is supported by the RFLD Ethics Committee, which has overall institutional responsibility for safeguarding governance. The Ethics Committee receives all safeguarding incident reports, oversees investigations, approves response plans, manages donor notifications, and reports to the Board on safeguarding performance annually. The Ethics Committee can be reached at integrity@rflgd.org and through any of the hotline numbers above.

8. Duty to Report — Who, What, When, and How

8.1 The Universal Duty to Report

Every Covered Person — every staff member, volunteer, consultant, Board member, partner, and supplier — has a personal, non-delegable obligation to report any safeguarding concern they become aware of or reasonably suspect. This obligation applies:

- Regardless of the seniority or institutional position of the alleged perpetrator.
- Regardless of whether the Covered Person is certain — a reasonable suspicion is sufficient and required.
- Regardless of whether the concern relates to conduct at work, outside work, or in a personal capacity — where the conduct could affect RFLD, its beneficiaries, or its reputation.
- Regardless of the reporter's personal relationship with the alleged perpetrator.
- Even where the Covered Person has some personal involvement in the situation.

Failure to report a known or reasonably suspected safeguarding concern is itself a disciplinary offence under this Policy. There is no 'wait and see' approach, no 'handling it informally,' and no 'not wanting to get involved.' The duty to report is absolute.

8.2 What Must Be Reported

The following must be reported through the channels in Section 9:

- Any actual or suspected incident of sexual exploitation, abuse, or harassment involving any Covered Person, beneficiary, or community member.
- Any actual or suspected harm to a child — including physical, emotional, or sexual abuse, or neglect.
- Any TFGBV incident as defined in Section 6.2.
- Any pattern of conduct that, while not yet a specific incident, raises a reasonable concern about safeguarding risk — for example, a staff member spending excessive one-on-one time with a beneficiary, repeatedly making sexual jokes, or receiving unexplained gifts from community members.
- Any concern that a safeguarding incident has occurred but is being suppressed or not escalated appropriately.
- Any disclosure made to a Covered Person by a survivor or potential survivor — even if the survivor asks for confidentiality. The duty to report overrides a request for confidentiality in all cases involving ongoing risk of harm.

8.3 Absolute Priority: Safety Before Confidentiality

While RFLD takes confidentiality seriously, the safety of any person at risk always takes priority over confidentiality. Where reporting a concern to the Safeguarding Focal Point would create an immediate safety risk to the reporter, the reporter's safety takes precedence and they should report as soon as safe to do so. In all other circumstances, the duty to report cannot be overridden by a request for confidentiality.

8.4 Mandatory Reporting to National Authorities

In addition to RFLD's internal reporting obligations, national law in several of RFLD's countries of operation imposes mandatory reporting requirements — requiring RFLD staff and in some cases volunteers and partners to report suspected child abuse, child sexual exploitation, and some forms of gender-based violence to national authorities. The Safeguarding Focal Point is responsible for knowing the mandatory reporting obligations in their country and activating them where required. RFLD will support any Covered Person in fulfilling their legal mandatory reporting obligations without adverse consequence.

9. Reporting Channels — Consolidated Framework

⚠ IF A PERSON IS IN IMMEDIATE PHYSICAL DANGER — CALL NATIONAL EMERGENCY SERVICES FIRST. Then use RFLD channels. The safety of the person at risk is always the first priority.

9.1 Primary Reporting Channels

Channel	Full Contact Details	Best Used For
Safeguarding Focal Point (SFP) — Most Situations	Contact the SFP at your nearest RFLD office: Cotonou: integrity@rflgd.org +229 01 50 02 46 19 Accra: integrity@rflgd.org +233 53 496 8866 Dakar: integrity@rflgd.org +221 77 541 84 37 Banjul: integrity@rflgd.org +229 01 50 02 46 19	All safeguarding concerns. First point of contact for most situations. SFPs are trained, confidential, and non-judgmental.
Ethics Committee — Direct	Email: integrity@rflgd.org Monitored exclusively by the Ethics Committee Available 24/7 for urgent matters	Complex cases; cases involving the SFP; cases where the reporter is not comfortable contacting the SFP; multiple office involvement.
Secure Online Form	URL: rflgd.org/rfld-internal-policies/ Open Secure Form on the Ethics & Reporting page Available 24/7; supports English and French; anonymous submission available	Anonymous reports; documentary evidence submission; reporters in remote locations with internet access.
Direct to Board Chair	Via: admin@rflgd.org Subject: 'For Board Chair — Safeguarding — CONFIDENTIAL' Or sealed letter to Cotonou HQ marked for Board Chair	Cases involving the Executive Director, the Ethics Committee, or any case where internal channels have been compromised.
National Emergency / Support Services	Contact national emergency services, police, or specialist support organisations (domestic violence shelters, child protection services, rape crisis centres) in the relevant country. RFLD SFPs maintain a list of national referral resources for each country of operation.	Immediate physical danger; criminal conduct requiring police involvement; medical emergencies; cases involving children requiring mandatory reporting to authorities.

9.2 Confidentiality in Reporting

RFLD is committed to protecting the confidentiality of both reporters and survivors throughout the reporting and investigation process. Specifically:

- The identity of the reporter is protected to the maximum extent possible consistent with conducting a fair investigation.
- Information about the concern is shared only with those who need to know in order to manage the response — SFP, Ethics Committee, Executive Director, and (where required) Board and donors.
- The identity of the alleged perpetrator is not disclosed more broadly than necessary during the investigation.
- All investigation records are treated as confidential and stored securely in accordance with the RFLD Data Protection Policy.

Confidentiality has limits: RFLD cannot guarantee absolute confidentiality where disclosure is required by national law (mandatory reporting), by a court order, or in order to prevent serious ongoing harm to a person at risk.

10. Survivor-Centred Response Framework

10.1 The Survivor-Centred Principle

The survivor-centred approach is the non-negotiable foundation of RFLD's response to every safeguarding incident. It means that at every stage — from first report to final outcome — the survivor's immediate safety, dignity, autonomy, and wellbeing take priority over: RFLD's institutional reputation; programme continuity; the comfort or career of the alleged perpetrator; operational convenience; or any other organisational interest.

The survivor-centred approach also means respecting the survivor's agency. Where the survivor does not want to report formally, does not want RFLD to take action, or wants only certain types of support, RFLD will respect those wishes to the greatest extent possible — while being transparent about the limits of that respect (for example, where ongoing harm to others requires action regardless of the survivor's preference).

10.2 Immediate Response — First 24 Hours

Step	Action	Who is Responsible
1	Safety first: Ensure the immediate physical safety of the survivor — including separating them from the alleged perpetrator if they are in the same location. If there is immediate physical danger, contact national emergency services before any other action.	First Covered Person to receive the report; SFP upon notification
2	Listen and believe: Receive the survivor's account in a non-judgmental, supportive way. Do not question their account, minimise their experience, or make assumptions. Do not promise outcomes. Use the survivor's own words.	SFP
3	Refer to support: Immediately connect the survivor to available support services — medical care if needed; psychological support; legal advice; safe housing if required. Provide the national referral list maintained by the SFP.	SFP
4	Notify: SFP notifies the Ethics Committee and the Executive Director within 4 hours of receiving a report of sexual exploitation or abuse involving a beneficiary or child.	SFP
5	Log the incident: Complete the Safeguarding Incident Report Form (Annex I) within 24 hours of receiving the report. File securely. Assign a case reference number.	SFP in coordination with Ethics Committee Secretary
6	Donor notification: Where required by the grant agreement, notify the relevant donor (typically Sida within 72 hours of a serious incident coming to RFLD's attention). Finance Manager coordinates.	Executive Director with Finance Manager support

10.3 Ongoing Survivor Support

RFLD's commitment to the survivor extends beyond the first 24 hours throughout the entire response process:

- The survivor is assigned a dedicated support contact within RFLD (typically the SFP or a designated staff member) who maintains regular, safe contact throughout.
- The survivor receives clear, honest information about what RFLD will do, what it cannot do, and why — including the obligations that override survivor confidentiality preferences.
- The survivor is offered a choice about the form of support they want — psychological counselling, legal support, safety planning, material assistance, or simply being heard.

- Where the alleged perpetrator is an RFLD staff member, RFLD will take all necessary interim measures (suspension, reassignment, removal from programme activities) to ensure the survivor is not in contact with the perpetrator during the investigation.
- The survivor is informed of the outcome of the investigation to the extent permitted by the confidentiality rights of the subject.
- Where reintegration into programme activities or the working environment is sought by the survivor, RFLD will facilitate this with appropriate support.

10.4 Support Resources by Country

The Safeguarding Focal Point at each office maintains a current list of national support resources relevant to their location — including medical care providers, psychological counselling services, legal aid organisations, domestic violence shelters, and child protection services. This list is reviewed and updated annually. The national referral lists are available on request from any SFP and are distributed to programme staff in each country before the start of any field activity.

10.5 Balancing Confidentiality and Institutional Obligations

RFLD will always be transparent with survivors about the limits of confidentiality — before they share their account, not after. The survivor must know that:

- RFLD will keep their identity confidential to the greatest extent possible.
- RFLD may be legally required to report to national authorities in some countries and circumstances.
- Where there is ongoing risk of harm to other people, RFLD has a duty to act regardless of the survivor's preference.
- The Ethics Committee and the Executive Director will be informed of serious incidents as a necessary part of RFLD's institutional response.

11. Investigation Process

11.1 Who Investigates

Safeguarding investigations are overseen by the Ethics Committee. Given the sensitivity and complexity of safeguarding investigations — particularly those involving sexual exploitation, abuse, or harm to children — RFLD will normally commission an external, qualified investigator with specific PSEAH investigation training for any case above minor workplace harassment. The external investigator reports to the Ethics Committee. Where an external investigator cannot be procured within 48 hours of a decision to investigate, an internal investigator with no conflict of interest and safeguarding training may be assigned as an interim measure.

11.2 Investigation Principles

All safeguarding investigations are conducted in accordance with the following principles, which build on and supplement the investigation principles in RFLD's Anti-Corruption Policy:

- **Trauma-informed practice:** Investigators must be trained in trauma-informed interviewing techniques. Re-traumatisation of the survivor through repeated, invasive, or sceptical questioning is unacceptable and will invalidate the investigation.
- **Do no harm:** At every stage, the investigation process must not cause additional harm — to the survivor, to the reporter, to any children involved, or to the community.
- **Survivor agency:** The survivor's preferences regarding the pace, form, and extent of their participation in the investigation are respected to the maximum extent compatible with reaching a fair outcome.
- **Child-specific protocols:** Where a child is involved, the investigation must follow child protection protocols — including use of appropriate interview techniques, guardian involvement, and specialist child protection expertise.
- **Confidentiality and data security:** All investigation records are stored in accordance with the RFLD Data Protection Policy. Digital records containing survivor identities use pseudonymisation.

11.3 Investigation Timelines

Stage	Standard Deadline	Maximum Extension
Incident reported and logged	Within 24 hours of first report	Not extendable
Survivor support activated and safety secured	Within 24 hours of report	Not extendable
SFP notification to Ethics Committee	Within 24 hours of receiving report	Not extendable
ED notification (for SEA involving beneficiary / child)	Within 4 hours of SFP receiving report	Not extendable
Donor notification (where required)	Within 72 hours of incident coming to RFLD's attention	Not extendable
Decision on investigation approach (internal / external)	Within 48 hours of Ethics Committee receiving report	Not extendable
Investigator appointed and briefed	Within 5 business days	Not extendable
Investigation plan developed	Within 5 business days of appointment	Not extendable
Subject notified of investigation	Within 5 business days of investigation decision	Not extendable
Interim protective measures in place	Within 24 hours of investigation decision	Not extendable
Investigation completed	Within 30 calendar days	15 days — Ethics Committee Chair approval
Ethics Committee decision on outcome	Within 10 business days of receiving final report	Not extendable

Stage	Standard Deadline	Maximum Extension
Decision communicated to subject	Within 5 business days of Committee decision	Not extendable
Survivor informed of outcome (to extent permitted)	Within 5 business days of Committee decision	Not extendable

11.4 Cases Involving Children

Any safeguarding investigation involving a child requires additional protocols:

- An external specialist with child protection investigation training must be appointed — internal investigation of child protection cases is prohibited.
- The child's parent or legal guardian must be informed (unless the guardian is the suspected perpetrator, in which case an alternative appropriate adult is appointed).
- The investigation follows child-appropriate interviewing techniques — no direct confrontational questioning of the child.
- National mandatory reporting obligations are activated immediately.
- RFLD coordinates with national child protection authorities throughout the investigation.

12. Sanctions and Consequences

12.1 Principles of Sanctioning in Safeguarding Cases

Safeguarding violations — particularly sexual exploitation and abuse involving beneficiaries or children — are among the most serious offences under RFLD's policy framework. Sanctions in safeguarding cases therefore reflect the severity of the violation and the heightened trust placed in anyone working with vulnerable populations. RFLD's zero-tolerance commitment means that substantiated serious violations result in summary dismissal as the default outcome.

12.2 Sanctions by Category of Violation

Violation Category	Default Sanction	Additional Measures
Sexual exploitation of a beneficiary	Summary dismissal	Referral to law enforcement; notification to donors; sector-wide debarment list where applicable; criminal prosecution referral
Sexual abuse (rape, assault) of any person	Summary dismissal	Immediate police referral mandatory; donor notification; permanent debarment from RFLD and referral to sector-wide lists
Child sexual abuse material (CSAM)	Summary dismissal	Mandatory referral to national authorities; notification to relevant international authorities (INTERPOL NCB)
Sexual exploitation of a child (under 18)	Summary dismissal	Mandatory law enforcement referral; national child protection authority notification; permanent debarment
Serious sexual harassment (repeated or involving power abuse)	Summary dismissal or dismissal for cause	Survivor support activated; potential law enforcement referral depending on severity; donor notification
Single instance sexual harassment — severe	Final written warning to dismissal	Mandatory training; supervised monitoring; potential reassignment
Single instance sexual harassment — moderate	Written warning to final written warning	Mandatory PSEAH training; apology where survivor consents; monitored closely
Failure to report a known safeguarding concern	Written warning to summary dismissal depending on severity of concealed incident	Training; supervisor review; potential involvement of anti-corruption provisions
TFGBV (non-consensual image sharing, doxxing)	Summary dismissal or dismissal for cause	Law enforcement referral; survivor digital security support activated; donor notification
Inappropriate conduct with a child (non-sexual but harmful)	Written warning to dismissal for cause	Mandatory child protection training; review of role suitability; potential reassignment

⚠ ZERO TOLERANCE IN PRACTICE: Sexual exploitation of beneficiaries, sexual abuse, and all child sexual abuse result in immediate suspension upon credible allegation, mandatory Board notification, referral to law enforcement where evidence supports, and permanent debarment from RFLD. These consequences apply regardless of seniority, length of service, nationality, or any other factor.

12.3 Sanctions for Partner Organisations

Where a safeguarding violation is committed by a staff member of an implementing partner, sub-grantee, or supplier, RFLD will:

- Immediately notify the partner organisation's leadership and demand urgent action.
- Suspend disbursements to the partner pending investigation where the violation involves misuse of RFLD funds or programme resources.
- Require the partner to demonstrate that appropriate disciplinary action has been taken within 30 days.

- Consider terminating the partnership agreement where the violation is serious and the partner's response is inadequate.
- Report to relevant donors as required by grant agreements.

13. Safe and Trauma-Informed Recruitment

13.1 The Safe Recruitment Principle

RFLD's commitment to safeguarding begins before employment — in how RFLD recruits, screens, and onboards the people who will interact with beneficiaries and communities. Safe recruitment does not prevent all risk, but it significantly reduces it and demonstrates RFLD's commitment to due diligence. Safe recruitment applies to all roles — not only those with direct beneficiary contact.

13.2 Safe Recruitment Requirements

The following requirements apply to all RFLD recruitment processes. They are detailed in the Safe Recruitment Checklist (Annex II):

- All job descriptions for roles involving beneficiary contact include an explicit statement that the role is subject to safeguarding screening and that candidates with relevant criminal convictions will not be appointed.
- All application forms include a self-declaration on safeguarding violations, criminal convictions related to offences against persons, and any previous employment terminations for conduct reasons.
- All shortlisted candidates are required to provide the contact details of at least two professional referees who are asked specific safeguarding questions during reference checks.
- Reference checks for roles involving beneficiary contact include the specific question: 'Do you have any reason to believe that this person poses a safeguarding risk in a role involving work with women, girls, children, or vulnerable populations?'
- Criminal background checks (police clearance or CRB equivalent) are required for all roles in direct programme delivery, where legally permissible in the relevant country.
- All newly appointed staff must sign the RFLD Code of Conduct (Annex V) before commencing any activity involving beneficiary contact.
- All newly appointed staff must complete the RFLD safeguarding induction within 2 weeks of starting.

13.3 Ineligible Candidates

RFLD will not employ, contract, engage as a volunteer, or appoint to the Board any person who:

- Has been found guilty of any sexual offence, offence involving violence against a person, or child protection offence — regardless of when the conviction occurred or how the offence was categorised.
- Has been dismissed from a previous employer for conduct constituting sexual exploitation, abuse, or serious harassment — regardless of whether criminal proceedings were taken.
- Is currently subject to a restraining order, civil protection order, or equivalent legal instrument related to conduct involving harm to persons.
- Is listed on any sector-wide safeguarding alert list, inter-agency misconduct database, or equivalent system to which RFLD has access.

13.4 Probationary Period Safeguarding Assessment

During the probationary period for all new staff in roles involving beneficiary contact, the Safeguarding Focal Point conducts a mid-probation safeguarding assessment — reviewing the staff member's understanding of this Policy, their conduct in any beneficiary-facing activities, and their engagement with safeguarding training. The outcome is documented and forms part of the probation assessment.

14. Partner, Supplier, and Sub-Grantee PSEAH Obligations

14.1 Baseline Requirements

All implementing partners, sub-grantees, and suppliers engaged in field activities — or any activity involving direct or indirect contact with RFLD beneficiaries or communities — must meet the following baseline safeguarding requirements as a condition of engagement. These requirements are non-negotiable and must be included in all sub-grant agreements and contracts:

- Have a written organisational safeguarding / PSEAH policy — or have formally committed in writing to adopt RFLD's standards for the duration of the engagement.
- Have designated a Safeguarding Focal Point or equivalent in their organisation.
- Include a safeguarding and PSEAH clause in all contracts with their own staff, consultants, and volunteers engaged in RFLD-funded activities.
- Report any safeguarding incident involving RFLD-funded activities to RFLD's Safeguarding Focal Point within 24 hours of the incident coming to the partner's attention.
- Provide evidence of safeguarding training for staff and volunteers in direct contact with beneficiaries — confirmed in narrative programme reports.

14.2 Tiered Partner Requirements

Partner Category	RFLD Engagement Value	Safeguarding Requirements
Category A — Low risk	Up to USD 5,000 or no beneficiary contact	Signed RFLD Code of Conduct; self-declaration on no prior incidents; awareness of RFLD reporting channels.
Category B — Medium risk	USD 5,001 – 25,000 with indirect beneficiary contact	Above + written safeguarding policy or formal adoption of RFLD standards; designated SFP; annual training confirmation; incident reporting clause in agreement.
Category C — High risk	USD 25,001 – 100,000 with direct beneficiary contact	Above + PSEAH Partner Self-Assessment Questionnaire (Annex III); SFP training verification; annual safeguarding field visit by RFLD; mid-term PSEAH review.
Category D — Institutional	Above USD 100,000 or consortium implementing partner	Full institutional PSEAH audit; external PSEAH assessment; joint safeguarding governance mechanism; quarterly incident reporting; Sida and donor alignment.

14.3 Due Diligence and Monitoring

The RFLD SFP conducts an annual safeguarding due diligence review of all Category C and D partners, including: review of the partner's PSEAH policy; confirmation of SFP designation; review of training records; and a structured discussion of any near-misses or concerns during the year. The SFP completes the PSEAH Partner Self-Assessment Questionnaire (Annex III) jointly with the partner and reports findings to the Ethics Committee. Poor safeguarding governance by a partner triggers an escalation plan — including capacity support, enhanced monitoring, or, in serious cases, suspension and review of the partnership.

15. Training and Capacity Building

15.1 Mandatory Training Schedule

Who	Training Content	Frequency and Deadline
All new staff and volunteers	Safeguarding induction: this Policy; Code of Conduct; definitions; reporting channels; immediate response protocol; survivor-centred approach	Within 2 weeks of start date — mandatory pre-condition for any beneficiary-facing activity
All existing staff and long-term volunteers	Annual refresher: policy updates; case studies; TFGBV update; new risks; reporting reminder	Annually — by 28 February each year
Safeguarding Focal Points	Advanced PSEAH training: trauma-informed investigation; survivor interviewing; child protection protocols; national referral systems; donor reporting	Upon appointment as SFP; annual advanced training thereafter
Programme staff in field roles	Contextual safeguarding training specific to operating environment; community-level safeguarding; TFGBV in field settings	Before each field deployment; annually for ongoing field staff
HR and recruitment staff	Safe recruitment procedures; reference check protocol; ineligibility criteria; probation safeguarding assessment	Upon appointment; annually
Board and committee members	Governance responsibility for safeguarding; PSEAH overview; annual report review	Upon joining Board; annually
Implementing partners (Category B and above)	RFLD PSEAH standards; partner reporting obligations; survivor-centred approach; child protection basics	At partnership inception; annually for multi-year partners

15.2 Trauma-Informed Approach to Training

RFLD's safeguarding training is delivered using a trauma-informed approach — recognising that many RFLD staff, partners, and beneficiaries may themselves have experience of gender-based violence, exploitation, or harassment. Training is delivered in a manner that: does not re-traumatise participants; provides clear trigger warnings before sensitive content; allows participants to step out without penalty; and creates space for questions and support in a non-judgmental environment. Trainers are selected for both technical expertise and their ability to deliver sensitive content safely.

16. The Feminist and Intersectional Approach to Safeguarding

16.1 Safeguarding Through a Feminist Lens

RFLD's feminist analysis shapes every aspect of its safeguarding framework. Safeguarding violations are not random — they are expressions of gendered power. Sexual exploitation and abuse in aid settings are the direct result of the intersection of institutional power (the aid worker over the beneficiary), gender power (men over women and girls in patriarchal societies), and economic power (the resource-holder over the resource-seeker). Effective safeguarding does not treat these incidents as individual bad actors — it addresses the structural conditions that make exploitation possible.

RFLD therefore commits to:

- Analysing safeguarding risks through a lens of power — asking who holds power in each programme relationship and how that power could be misused.
- Designing programme activities to minimise harmful power differentials — ensuring beneficiaries have meaningful agency in programme decisions, feedback mechanisms, and grievance processes.
- Ensuring that safeguarding systems are accessible to and trusted by the most marginalised — those who face the highest risk are often the least likely to report. RFLD actively works to reduce barriers to reporting.

16.2 Intersectional Risk Analysis

RFLD recognises that safeguarding risk is not experienced uniformly — it is shaped by the intersection of multiple identities and circumstances. Persons at heightened safeguarding risk in RFLD's operating environments include:

- Women and girls in contexts of active conflict, displacement, or extreme poverty — where economic dependency on aid creates the conditions for exploitation.
- Women Human Rights Defenders and activists who face targeted harassment — including TFGBV — as a deliberate tool of political repression.
- LGBTQ+ individuals in countries where same-sex relationships are criminalised — who face both formal legal risk and heightened informal violence risk.
- Persons with disabilities — who face disproportionate rates of sexual violence and whose access to reporting mechanisms may be constrained.
- Young women and girls in youth programmes — who may be targeted precisely because of their youth and relative powerlessness.
- Women in francophone West and Central Africa — the specific geographic focus of RFLD's NAFASI work — where civic space is among the most contested on the continent and where digital authoritarianism compounds physical safeguarding risk.

RFLD's Safeguarding Risk Assessments (Annex IV) explicitly incorporate intersectional risk analysis. Programme design, event planning, and partner selection all include safeguarding risk review that reflects these contextual realities.

17. Governance, Reporting, and Policy Review

17.1 Board Accountability

The Board of Directors has ultimate accountability for RFLD's safeguarding performance. The Board receives:

- An Annual Safeguarding Report from the Ethics Committee — covering incidents reported, investigations conducted, outcomes, sanctions, training completion, and partner compliance.
- Immediate notification of any serious safeguarding incident — any case involving sexual exploitation of a beneficiary, any child protection case, or any TFGBV incident targeting an RFLD staff member.
- The Safeguarding Annual Report is shared with Sida and other relevant donors as part of RFLD's annual compliance reporting.

17.2 Annual Safeguarding Review

The Safeguarding Focal Points and Ethics Committee conduct an annual safeguarding review covering:

- Review and update of this Policy — incorporating learning from incidents, updates to donor standards, and changes in RFLD's operating context.
- Review and update of country-specific safeguarding risk assessments.
- Update of national referral resource lists for all offices.
- Review of training completion rates and identification of gaps.
- Review of partner safeguarding compliance status.
- Update of the Safeguarding Risk Assessment template (Annex IV) based on new risk intelligence.

17.3 Version History

Version	Date	Summary	Approved By
1.0	May 2026	Initial adoption — developed to meet Sida NAFASI programme requirements and international IASC PSEAH standards. Incorporates TFGBV provisions specific to RFLD's digital civic space mandate. Feminist and intersectional framework integrated throughout.	Board of Directors

18. International Standards Alignment

Standard / Framework	Key Provisions Reflected in This Policy
UN IASC Six Core Principles on PSEA	The six principles — creating an environment that reduces risk; making prevention everyone's responsibility; providing clear reporting mechanisms; having appropriate response procedures; maintaining confidentiality; supporting survivors — form the backbone of this Policy.
Keeping Children Safe International Standard	Safe recruitment, safe programming, child-specific investigation protocols, and mandatory reporting obligations incorporated throughout Sections 5, 13, and 11.
Sida Safeguarding Requirements for Civil Society Organisations	Mandatory SFP designation; written PSEAH policy; incident reporting to donor; survivor-centred approach; annual training evidence — all incorporated in Sections 7, 9, 10, and 15.
BOND (UK INGO Network) PSEAH Framework	Investigation principles, survivor-centred response, and Board accountability framework reflected in Sections 10, 11, and 17.
OECD DAC Guidance on Preventing Sexual Exploitation and Abuse	Zero-tolerance commitment; survivor-centred principles; partner accountability; safe recruitment — incorporated throughout.
Convention on the Rights of the Child (CRC)	Child-specific protections in Section 5 are aligned with the CRC's absolute prohibition on child sexual abuse and the child's right to protection, participation, and information.
Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW)	The feminist and intersectional analysis in Section 16 is grounded in CEDAW's framework of structural gender discrimination and the need for substantive equality in protection.
African Union Protocol to the African Charter on Human and Peoples' Rights on the Rights of Women in Africa (Maputo Protocol)	RFLD's PSEAH standards are aligned with the Maputo Protocol's provisions on violence against women, particularly Articles 3, 4, and 11. RFLD implements the Maputo Protocol through its programmatic work and its internal safeguarding standards simultaneously.

Policy Approval

Executive Director — Gloria Sekonou	Safeguarding Focal Point (HQ)	Board Representative
Name:	Name:	Name:
Title:	Title:	Title:
Signature:	Signature:	Signature:
Date:	Date:	Date:

ALL SAFEGUARDING CONTACTS — AVAILABLE 24/7

Safeguarding Email: integrity@rflgd.org Cotonou HQ (Benin): +229 01 50 02 46 19 Accra (Ghana): +233 53 496 8866 Dakar (Senegal): +221 77 541 84 37 Banjul (Gambia): +229 01 50 02 46 19 (via HQ) Secure Form: rflgd.org/rfld-internal-policies/ Board Chair (senior cases): admin@rflgd.org — 'For Board Chair — Safeguarding — CONFIDENTIAL' IF THERE IS IMMEDIATE PHYSICAL DANGER — CALL NATIONAL EMERGENCY SERVICES FIRST

Annex I — Safeguarding Incident Report Form

INSTRUCTIONS

Complete within 24 hours of receiving a safeguarding report. Submit to Ethics Committee at integrity@rflgd.org. This form is confidential — access restricted to SFP, Ethics Committee, Executive Director, Board, and authorised investigators.

Incident Reference No.		Date of This Report	
Reporting SFP Name & Office		Date Incident Was Reported to SFP	
Programme / Activity Involved		Country / Location of Incident	

Section A — Incident Details

Type of Incident (tick all that apply)	☐ Sexual Exploitation ☐ Sexual Abuse ☐ Sexual Harassment ☐ TFGBV ☐ Child Protection ☐ Physical Harm ☐ Other: _____
Is the Alleged Perpetrator a Covered Person? (Yes / No / Unknown)	
Is the Survivor a Beneficiary? (Yes / No / Unknown)	
Does the Incident Involve a Child Under 18? (Yes / No / Unknown)	
Is the Incident Ongoing? (Yes / No / Unknown)	
Summary of What Was Reported (factual — do not include survivor's name in this section without consent)	
Survivor's Immediate Safety Status and Support Provided	
Has the Survivor Consented to This Report? (Yes / No — explain if No)	

Section B — Immediate Actions Taken

☐	Immediate Action
☐	Survivor's immediate safety secured
☐	Survivor connected to medical / psychological / legal support
☐	Alleged perpetrator separated from survivor (if same location)
☐	Ethics Committee notified by email (integrity@rflgd.org)
☐	Executive Director notified (for SEA involving beneficiary / child)
☐	National authorities notified (where mandatory reporting applies — specify authority and date)
☐	Donor notified (where required — specify donor and notification date)
☐	Incident reference number assigned

Section C — Confidential Survivor and Perpetrator Details

SECURITY NOTICE

This section is STRICTLY CONFIDENTIAL. Store separately from Section A and B. Do not include in any donor report without survivor consent. Share only with: SFP, Ethics Committee, investigator, and authorised legal or medical professional.

Survivor Reference Code (not real name — use code only)	
Survivor Age (if known)	
Survivor Gender Identity (if known and if survivor consents to recording)	
Alleged Perpetrator Name (if known)	
Alleged Perpetrator Role / Position	
Relationship Between Perpetrator and Survivor	

Safeguarding Focal Point — Signature & Date	Ethics Committee Acknowledgement — Signature & Date
Name:	Name:
Title:	Title:
Signature:	Signature:
Date:	Date:

Annex II — Safe Recruitment Checklist

INSTRUCTIONS

Complete for every recruitment process for roles involving beneficiary contact. HR Officer completes; Safeguarding Focal Point countersigns. File in the recruitment record.

Position Being Recruited		Recruitment Date	
Does the Role Involve Beneficiary Contact? (Yes / No)		Does the Role Involve Work with Children? (Yes / No)	

	Safe Recruitment Step	Completed (✓ / ✗ / N/A)
1	Job description includes safeguarding responsibility statement	
2	Application form includes self-declaration on safeguarding violations and relevant criminal convictions	
3	Shortlisting criteria include no disqualifying safeguarding history	
4	At least two professional referees required from all shortlisted candidates	
5	Reference check form includes specific safeguarding question	
6	Reference checks completed and responses documented for all appointed candidates	
7	Criminal background check requested where legally permissible in the relevant country	
8	Criminal background check result reviewed by SFP	
9	Interview panel includes at least one person trained in safeguarding-aware interviewing	
10	Interview includes questions on the candidate's understanding of PSEAH and professional boundaries	
11	Ineligibility check completed (sector-wide lists, prior dismissals for conduct)	
12	Offer letter includes reference to safeguarding obligations and Code of Conduct	
13	RFLD Code of Conduct (Annex V) sent to candidate before start date	
14	Signed Code of Conduct received and filed before candidate commences activity	
15	Safeguarding induction scheduled within 2 weeks of start date	

HR Officer — Signature & Date	Safeguarding Focal Point — Countersignature & Date

Annex III — PSEAH Partner Self-Assessment Questionnaire

INSTRUCTIONS

To be completed jointly by the RFLD SFP and the partner's designated safeguarding focal point. Required for all Category C and D partners. Submit completed form to Ethics Committee. Review annually.

Partner Organisation Name		Country	
RFLD Sub-Grant / Contract Reference		Assessment Date	
Partner SFP Name & Contact		RFLD SFP Name	

PSEAH Standard	Met	Partial	Not Met
Organisation has a written PSEAH policy covering all staff and volunteers	☐	☐	☐
PSEAH policy was updated in the last 2 years	☐	☐	☐
Organisation has a designated Safeguarding Focal Point	☐	☐	☐
SFP has received PSEAH training in the last 12 months	☐	☐	☐
All staff in direct programme delivery have received PSEAH training in the last 12 months	☐	☐	☐
Organisation has a confidential reporting channel for safeguarding concerns	☐	☐	☐
Reporting channel details are communicated to all staff and beneficiaries	☐	☐	☐
Organisation has a survivor-centred incident response protocol	☐	☐	☐
Organisation conducted safe recruitment checks for all beneficiary-facing staff	☐	☐	☐
Organisation has not had any unresolved safeguarding incidents in the last 12 months	☐	☐	☐
Sub-contractors and suppliers are required to meet PSEAH standards	☐	☐	☐
PSEAH is included in the organisation's organisational risk register	☐	☐	☐

Recommended Actions for Standards Not Met or Partially Met

RFLD Safeguarding Focal Point — Signature & Date	Partner SFP — Signature & Date
Name:	Name:
Title:	Title:
Signature:	Signature:
Date:	Date:

Annex IV — Safeguarding Risk Assessment Template

INSTRUCTIONS

Complete before every programme activity involving direct contact with beneficiaries, communities, or children. Submit to the Safeguarding Focal Point for approval at least 5 business days before the activity. Review if the activity context changes significantly.

Activity Name / Description		Date and Location	
Programme / Project Reference		Estimated Number of Participants	
Does the Activity Involve Children? (Yes / No)		Country Security Level	
Responsible Staff Member		Designated Safeguarding Contact for Activity	

Risk Identification and Mitigation

Risk Factor	Risk Level (H/M/L)	Likelihood (H/M/L)	Mitigation Measures
Power imbalance between RFLD staff and participants			
One-on-one contact between staff and participants likely			
Activity involves children under 18			
Activity involves digital technology / online interactions			
Activity in a fragile, conflict-affected, or high-TFGBV-risk context			
Partner or volunteer staff not yet PSEAH trained			
Physical environment not safe or monitored			
Cultural / linguistic barriers to reporting concerns			
Economic vulnerability creating dependency on RFLD			
Activity involves sharing of personal data or photos of participants			

Prepared By — Signature & Date	SFP Approval — Signature & Date
☐ Approved ☐ Approved with conditions (specify below) ☐ Not approved	

Annex V — Code of Conduct for RFLD Staff and Representatives

INSTRUCTIONS

All staff, volunteers, consultants, and any Covered Person undertaking an RFLD activity involving contact with beneficiaries or communities must read, sign, and return this Code of Conduct before commencing the activity. File in the personnel or engagement record.

As a staff member, volunteer, consultant, Board member, or representative of RFLD, I commit to upholding the following standards of conduct at all times:

Section A — Conduct Towards Beneficiaries, Participants, and Communities

☐	I Will:
☐	Treat every beneficiary, programme participant, and community member with dignity, respect, and fairness.
☐	Maintain professional boundaries at all times — I will not initiate or engage in personal, romantic, or sexual relationships with programme beneficiaries or community members.
☐	Never use my position in RFLD to solicit or accept sexual favours, gifts, or any other personal benefits from beneficiaries or community members.
☐	Never exchange programme assistance, resources, benefits, or access for sexual access to any person.
☐	Always use the 'two-adult rule' when working alone with a child — I will never be alone in a private setting with a child without another adult present.
☐	Obtain explicit written consent (from parent or guardian for under-16s) before photographing, filming, or sharing images of beneficiaries or children.
☐	Report any safeguarding concern, incident, or near-miss to the Safeguarding Focal Point within 24 hours.

Section B — Conduct in the Workplace and Online

☐	I Will:
☐	Maintain a working environment free from sexual harassment, intimidation, and discriminatory conduct.
☐	Not engage in any conduct of a sexual nature towards a colleague that is unwanted or that exploits a power difference.
☐	Not send, share, or display sexually explicit, offensive, or discriminatory material in any RFLD communication or workspace.
☐	Not engage in TFGBV — including non-consensual image sharing, doxxing, digital stalking, or creation / distribution of deepfake sexual content.
☐	Not use RFLD digital tools (VPN, encrypted communications, data systems) to monitor colleagues or beneficiaries without authorisation.
☐	Protect the personal data and digital safety of every beneficiary I interact with.

Section C — Understanding and Commitment

I confirm that:

- I have read and understood RFLD's Safeguarding and PSEAH Policy (RFLD-POL-SFG-v1.0).
- I understand that violations of this Code of Conduct may result in immediate suspension, termination of my engagement with RFLD, and referral to relevant authorities.
- I will complete RFLD's mandatory safeguarding induction training within 2 weeks of commencing my engagement.
- I understand that this Code of Conduct applies in all contexts — in RFLD offices, at programme activities, at RFLD events, online, and in any other setting where I am acting in RFLD's name.

Full Name	Signature	Date
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