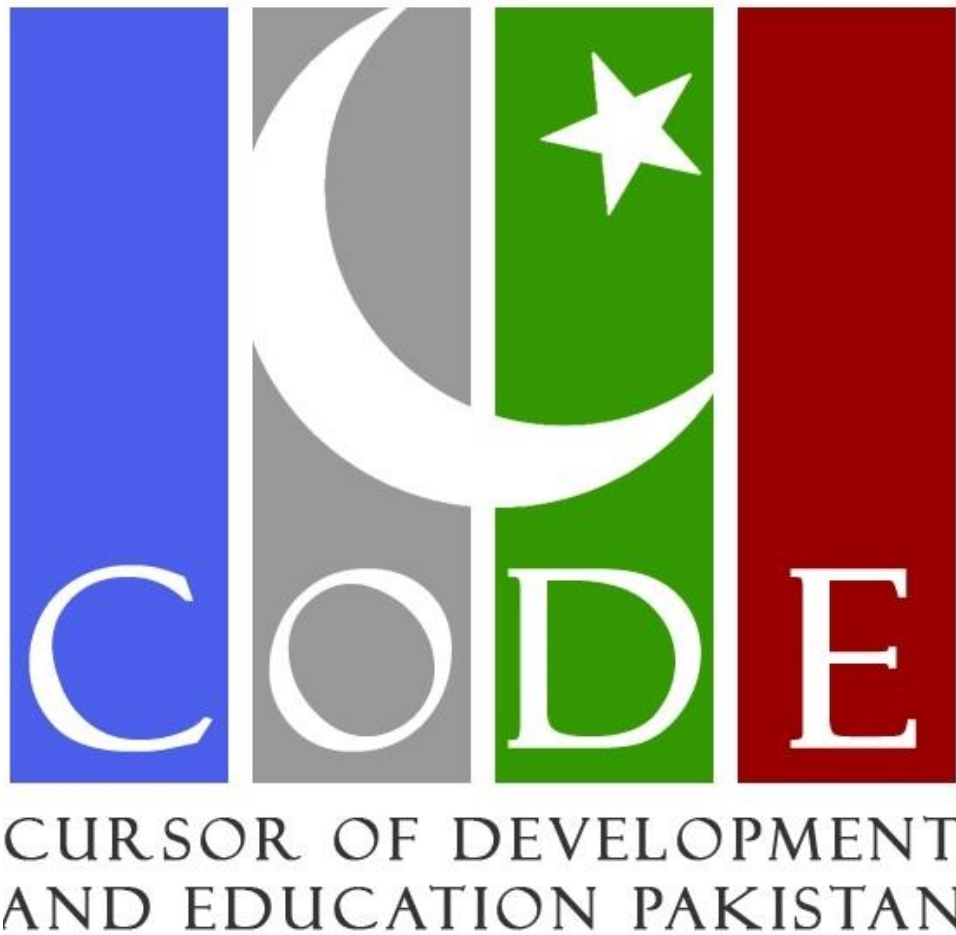


SAFEGUARDING POLICY



CODE PAKISTAN

Updated June 2022

In exercise of powers conferred upon it under Article 7(b) of the constitution of CODE PAKISTAN, The Executive Committee in its meeting held on 24 Jun 2022 agreed on and unanimously assented to the following updated safeguarding policy for the Organization. The meeting was attended by:

Signed by members of the Executive body, CODE PAKISTAN

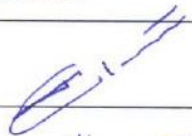
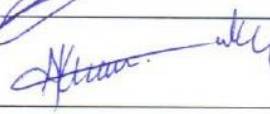

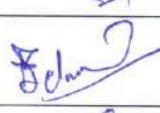
S. No	Name	CNIC No	Signature
1.	Dilawar Khan	61101-8303883-9	
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CODE PAKISTAN Safeguarding Policy

1. Policy Statement

CODE PAKISTAN appreciates its responsibility to promote human dignity and social justice within the organization and maintain a safe and respectful workplace. We recognize the importance of organizational culture and accountability in creating a safe and supportive organization for our staff, partners, and the communities with whom we work.

At CODE PAKISTAN, we believe all people have a right to live their lives free from sexual harassment, exploitation and abuse, and that no child should be subjected to abuse of any form. We believe that sexual harassment, exploitation and abuse, and child abuse, are more likely to be exerted over particular groups of people due to inequalities and vulnerabilities, such as women, vulnerable adults, and children. We recognize that there is unequal power between CODE PAKISTAN Employees and Related Personnel and the people we partner and work with throughout our programmes, and also between people within our organization. We expect that our power will not be used to advantage ourselves or cause harm to others.

CODE PAKISTAN recognizes that we have a responsibility to protect people we work with and who work for us and we will continuously strive to prevent sexual harassment, exploitation and abuse, and child abuse from happening. We take seriously all reports of sexual harassment, exploitation and abuse, and child abuse. Our actions are informed by a survivor-centred approach which means that the needs and wishes of survivors guide our response, that survivors are treated with dignity and respect, and the rights of survivors to privacy and support are prioritized.

CODE PAKISTAN has a zero-tolerance approach toward sexual harassment, exploitation and abuse, and child abuse. We will carefully examine allegations and investigate, and take appropriate disciplinary action where this is needed, taking into consideration the rights and interests of the survivor, consistent with CODE PAKISTAN's survivor-centred approach. We make very clear that sexual harassment, exploitation and abuse, and child abuse in any form, perpetrated by our staff, partners, or other related personnel, towards anyone, will not be tolerated.

2. Scope of Application

This policy applies to all CODE PAKISTAN Employees and Related-Personnel:

- CODE PAKISTAN Employees include all employees of any CODE PAKISTAN and our downstream partners;
- Related Personnel includes board members, volunteers, interns, visitors, and consultants, in addition to individual and corporate contractors of these entities and related personnel. Related Personnel also includes non-CODE PAKISTAN entities and their employees and individuals who have entered into partnerships, sub-grants or sub-recipient agreements with CODE PAKISTAN, as well as incentive workers.

The policy applies both during, and outside, normal work hours. Actions taken by CODE PAKISTAN Employees and Related Personnel outside of working hours that are seen to contradict this policy will be seen as a violation of this policy.

3. CODE PAKISTAN's Safeguarding Commitments

Organizational Culture, Leadership, and Accountability

3.1 CODE PAKISTAN will make every effort to promote, create, and maintain a safe

organizational culture for all people who work for and with CODE PAKISTAN, including our partners and the communities where CODE PAKISTAN works. At all times, it is expected that CODE PAKISTAN's leaders will promote CODE PAKISTAN's safeguarding values by highlighting the organization's commitment to equality, diversity, and respect for others. CODE PAKISTAN will create an environment where it is safe to address sexual harassment, exploitation and abuse, and child abuse.

- 3.2 CODE PAKISTAN will develop organization-specific safeguarding strategies**, with appropriate levels of dedicated capacity and allocated resources at all levels of the organization, to prevent and respond to sexual harassment, exploitation and abuse, and child abuse.
- 3.3 CODE PAKISTAN will ensure high-level oversight and accountability** around its safeguarding efforts. We will do this through monitoring and reviewing our safeguarding performance and seeking feedback from CODE PAKISTAN Employees and Related Personnel, partners, programme participants and communities where CODE PAKISTAN works, on the effectiveness of our safeguarding measures. We are committed to continuous learning and improvement to prevent and respond to sexual harassment, exploitation and abuse, and child abuse. We will be accountable and transparent in communicating our efforts and progress to various internal and external audiences, including CODE PAKISTAN governance and leadership structures, staff, donors, partners, the wider sector and communities. All information shared will be informed by a survivor-centred approach and risk assessment.

People Management

- 3.4 CODE PAKISTAN will seek to employ staff who are aligned with our vision, mission and values, and, in compliance with applicable laws, prevent known perpetrators of sexual harassment, exploitation and abuse and child abuse from being (re)hired or (re)deployed.** We will incorporate appropriate job responsibilities in leadership, managers, and other staff positions. Managers and Human Resource teams will ensure robust recruitment screening processes for all personnel, particularly for personnel who will have any direct or indirect contact with children and/or vulnerable adults. We may include in performance management/ feedback processes of senior managers, the adherence to create and maintain an environment which promotes this policy to prevent sexual harassment, exploitation and abuse, and child abuse.
- 3.5 CODE PAKISTAN will ensure all personnel are aware of our Safeguarding Policy, our expected behaviours and conduct, and how to report wrongdoing** by incorporating CODE PAKISTAN's expectations on the prevention of sexual harassment, exploitation and abuse, and child abuse in relevant codes of conduct, new employee orientations, awareness raising training and refresher courses, and through regular internal communications.
- 3.6 CODE PAKISTAN will collaborate on safeguarding within the sector**, including with communities, other organizations, donors, governments, global civil society networks and local partners, to advance our practices and contribute to wider efforts to prevent and respond to sexual harassment, exploitation and abuse, and child abuse.

Embedding Safeguarding in our Work

- 3.7 CODE PAKISTAN will undertake safeguarding risk assessments** to identify areas of safeguarding and sexual harassment, exploitation and abuse, and child abuse risks, and document steps that are being taken to remove or reduce these risks.
- 3.8 CODE PAKISTAN will incorporate safeguarding measures into programmes and**

throughout the project cycle. We will do this through our collaborative programme design approach, including with our partners and programme participants, at all stages to produce better design, monitoring and evaluation of safeguarding in our programmes. We aim to identify and mitigate, or minimize, risks arising from our programmes.

Reporting and Response Mechanisms

- 3.9 Unless a Chief Safeguarding Officer is specifically notified, the Vice President/Executive Director of CODE PAKISTAN will serve as the Chief Safeguarding Officer,** being immediate controller of the safeguarding policy and procedures, representing the executive committee in day to day matters. The executive committee obviously will be the leading body, for legislation and approval of all the matters related to this policy.
- 3.10** The Chief Safeguarding Officer will ensure that the victim/informant/whistle blower is safe from all adverse actions and treated with respect and given every opportunity of fair audience. Ordinarily, all harms or anticipated harms will be reported to the Chief safeguarding officer in writing as a signed hardcopy or through the official email address. The Chief Safeguarding Officer may also initiate proceedings on the basis of his personal observations but in such case, he/she will take prior approval of the Executive Committee. The Executive Committee may nominate any other enquiry officer/tribunal in such case.
- 3.11 The Safeguarding officer, where necessary, will hold enquiries into the reports and pass his judgment on the basis of evidence brought before him/her.** If any person is found guilty, appropriate penalty will be awarded to such persons, as provided in the HR Manual. The persons reporting any harm, will be bound to record evidence before the Chief Safeguarding Officer and produce other such evidence as is in his/her reach and required for just conclusion of the matter in issue. Any false report, disproved during the enquiry proceedings would also amount to misconduct and opened for enquiry under the conduct rules. The Chief Safeguarding Officer will maintain a proper record of the report, proceedings, and response and also record his/her observations in the relevant filing system for the purpose maintained at the office.
- 3.12 CODE PAKISTAN will ensure that multiple mechanisms for reporting sexual harassment, exploitation and abuse, and child abuse are accessible** and sensitive to the differing needs of anyone wishing to report, including vulnerable adults and children most at risk of sexual harassment, exploitation and abuse, and child abuse, the communities we work with, our partners, and CODE PAKISTAN Employees and Related Personnel. We will involve programme participants in the design, monitoring and evaluation of community-based reporting mechanisms. We will raise community awareness on the expected behaviours of our Employees and Related Personnel and on how to make a report. CODE PAKISTAN will ensure that anyone responsible for receiving reports understands how to carry out their duties and handle them in a safe and confidential manner. We will be transparent with survivors around any obligations or actions that may need to be taken as a result of their report, including referral to third parties. All actions will be informed by an assessment of risk to all those involved.

Response and follow up to Reports

- 3.13 CODE PAKISTAN will provide support and assistance to complainants and to anyone who has experienced sexual harassment, exploitation and abuse, or child abuse by CODE PAKISTAN Employees and Related Personnel.** This may include medical treatment, legal assistance, and psycho-social support. Our support and assistance will be informed by a survivor-centred approach, feasibility, and an assessment of risk to all those involved.

- 3.14 CODE PAKISTAN will take appropriate actions to the best of CODE PAKISTAN's abilities to protect persons from retaliation** where allegations of sexual harassment, exploitation and abuse, or child abuse involving CODE PAKISTAN Employees or Related Personnel are reported in good faith.
- 3.15 CODE PAKISTAN will ensure that all allegations of sexual harassment, exploitation and abuse, and child abuse by CODE PAKISTAN Employees and Related Personnel are thoroughly examined, risk-assessed, and where needed, investigated and/or referred to another agency for investigation or reported to law enforcement.** CODE PAKISTAN's investigations will be conducted in a timely, safe, and professional manner by those with appropriate training and experience in sensitive investigations and informed by gender-sensitive and survivor-centred approaches. Investigations will include an assessment of risk to all those involved. We will collaborate with our partners to have the capacity to similarly investigate allegations of sexual harassment, exploitation and abuse, and child abuse by their staff.
- 3.16 CODE PAKISTAN will take swift and appropriate action with any Employee or Related Personnel who breach this policy by perpetrating sexual harassment, exploitation and abuse, and child abuse.** This may include administrative or disciplinary action, legal action, and/or referral to the relevant authorities for appropriate action, including criminal prosecution, in the abuser's country of origin as well as the host country. All actions will be informed by a survivor-centred approach and an assessment of feasibility and risk to all those involved.

4. CODE PAKISTAN's Safeguarding Code of Conduct¹

CODE PAKISTAN's capacity to achieve its vision and mission depends upon the individual and collaborative efforts of all CODE PAKISTAN Employees and Related Personnel. To this end, all CODE PAKISTAN Employees and Related Personnel must uphold and promote the highest standards of ethical and professional conduct and abide by CODE PAKISTAN's policies. This policy defines the safeguarding conduct to be followed by all CODE PAKISTAN Employees and Related Personnel to protect anyone, from sexual harassment, exploitation and abuse, and child abuse by CODE PAKISTAN Employees and Related Personnel.

Any violation of this Safeguarding Code of Conduct is a serious concern and may result in disciplinary action, up to and including dismissal, in accordance with disciplinary procedures laid out in CODE PAKISTAN's HR Manual and applicable laws. All CODE PAKISTAN employees must sign CODE PAKISTAN's Safeguarding Code of Conduct.

5. Responsibilities

5.1 All CODE PAKISTAN Employees and Related Personnel

All CODE PAKISTAN Employees and Related Personnel share an obligation to prevent, report and respond to sexual harassment, exploitation and abuse and child abuse. It is the responsibility of all CODE PAKISTAN Employees and Related Personnel to uphold CODE PAKISTAN's Safeguarding Policy and Safeguarding Code of Conduct. All CODE PAKISTAN Employees and Related Personnel must read this policy and either sign the Safeguarding Code of Conduct or sign a Code of Conduct that is consistent with or references this policy and Safeguarding Code of Conduct.

5.2 Managers, Supervisors and Human Resource Managers

¹ See Annex 1

Managers, Supervisors and Human Resource Managers must ensure that all CODE PAKISTAN Employees and Related Personnel understand and comply with CODE PAKISTAN's Safeguarding Policy and sign a declaration to that effect. Human Resource Managers are also responsible for robust safe recruitment and induction, whilst Managers and Supervisors are responsible for ensuring staff have a thorough awareness and sensitization to this policy and the issues it raises. Managers must ensure that all staff with specialized duties towards this policy have the appropriate experience, training and support available to them, including staff responsible for receiving and handling sensitive reports and staff responsible for investigations. Managers will ensure that performance management of staff supports an accountable and safe organisational culture to prevent sexual harassment, exploitation and abuse, and child abuse.

5.3 CODE PAKISTAN senior leadership

President and Vice President/Executive Director of CODE PAKISTAN must provide clear guidance and demonstrate how the organisation, across its operations, will make every effort to protect all people from sexual harassment, exploitation and abuse, and child abuse in the delivery of CODE PAKISTAN projects and programmes in-country. Country Directors must ensure that culturally appropriate, safe and accessible, community-based reporting mechanisms are developed, implemented, and monitored and reviewed for effectiveness. This includes awareness-raising with programme participants and CODE PAKISTAN Employees and Related Personnel about protection from sexual harassment, exploitation and abuse, and child abuse, and how to use the reporting mechanisms. President and Vice President/Executive Director of CODE PAKISTAN lead its work with local partners to ensure appropriate support, assessment, and monitoring of partner commitments in relation to this Policy. President and Vice President/Executive Director of CODE PAKISTAN will also make every effort to ensure that complaints handling and investigation procedures are enacted, along with appropriate employee disciplinary procedures as necessary. President and Vice President/Executive Director of CODE PAKISTAN are responsible for ensuring that good quality and appropriate survivor support services are researched and made available in their location.

ANNEX 1 - CODE PAKISTAN's Safeguarding Code of Conduct

CODE PAKISTAN's capacity to achieve its vision and mission depends upon the individual and collaborative efforts of all CODE PAKISTAN Employees and Related Personnel. To this end, all CODE PAKISTAN Employees and Related Personnel must uphold and promote the highest standards of ethical and professional conduct and abide by CODE PAKISTAN's policies. The CODE PAKISTAN International Safeguarding Policy, and this Safeguarding Code of Conduct, define the safeguarding conduct to be followed by all CODE PAKISTAN Employees and Related Personnel to protect anyone, from sexual harassment, exploitation and abuse, and child abuse, by CODE PAKISTAN Employees and Related Personnel.

This Safeguarding Code of Conduct is intended to provide an illustrative guide for CODE PAKISTAN Employees and Related Personnel to make decisions that exemplify CODE PAKISTAN's broader Code of Conduct and core values in their professional and personal lives. Any violation of this Safeguarding Code of Conduct is a serious concern and may result in disciplinary action, up to and including dismissal, in accordance with its disciplinary procedures and applicable laws. All CODE PAKISTAN Employees and Related Personnel must read and sign this Safeguarding Code of Conduct.

As a CODE PAKISTAN Employee or Related Personnel, I will –

1. Create and maintain a safe and equitable organizational culture that prevents and opposes sexual harassment, exploitation and abuse, and child abuse.
2. Treat everyone with dignity and respect and challenge attitudes and behaviours that contravene the CODE PAKISTAN International Safeguarding Policy and Safeguarding Code of Conduct.
3. Immediately report any concerns I have regarding possible violations of the CODE PAKISTAN Safeguarding Policy or Safeguarding Code of Conduct, whether by a CODE PAKISTAN Employee or by Related Personnel. I understand that failure to report any concerns may lead to disciplinary action. I will ensure that I am aware of the options available to me to report and that when I report a concern or allegation, I will do so confidentially.
4. Share sensitive information I may be aware of that relates to concerns of sexual harassment, exploitation and abuse or child abuse, whether involving staff, programme participants, or others in the communities where CODE PAKISTAN works, through the reporting options available to me. I understand that for respect, dignity, and safety of everyone involved, it is essential that I maintain confidentiality about any concerns or information I am aware of and only share information with staff of the appropriate function who need to know such information. I am aware that breach of this policy may put others at risk and will therefore result in disciplinary procedures.
5. Disclose to CODE PAKISTAN any civil judgment or criminal conviction that relates to allegations made against me of sexual harassment, exploitation, or abuse of anyone.
6. Always make sure I have another adult present when working with children.
7. Always ensure that for work-related purposes when I photograph or film a child, I:
 - Comply with local traditions or restrictions for reproducing personal images,
 - Obtain informed consent from the parent or guardian of the child, before photographing or filming a child, explaining how the photograph or film will be used,
 - Ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner,

- Ensure children are adequately clothed and not in poses that could be seen as sexually suggestive,
 - Ensure images are honest representations of the context and the facts, and
 - Ensure file labels do not reveal identifying information about a child, for example, name and exact location.
8. Protect, manage, and utilize CODE PAKISTAN human, financial, and material resources appropriately and will never use CODE PAKISTAN resources, including the use of computers, cameras, mobile phones, or social media, to exploit, groom, or harass participants of CODE PAKISTAN programmes, children or others in the communities in which CODE PAKISTAN works. I am aware that this means that it is prohibited for staff to access, display or transmit offensive and/or pornographic material on any CODE PAKISTAN-provided or subsidized electronic device (e.g. computer, tablet, phone) at any time, or on any personal electronic device on a CODE PAKISTAN network in the workplace.

As a CODE PAKISTAN Employee or Related Personnel, *I will not* -

1. Sexually harass, exploit or abuse anyone and understand that these behaviours constitute acts of gross misconduct and are therefore grounds for disciplinary action, up to and including dismissal.
2. Engage in any form of sexual activity or develop physical/sexual relationships with children (persons under the age of 18) regardless of the age of consent locally. I understand that ignorance or mistaken belief in the age of a child is not a defence.
3. Exchange money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. I understand this means I must not buy sex from anyone at any time, or exchange assistance that is due to programme participants/beneficiaries for sex.
4. Engage in any sexual activity or sexual relationship with programme participants/beneficiaries. I am aware that such relationships are prohibited. I understand that such relationships are based on an improper use of my position and inherently unequal power dynamics and may undermine the credibility and integrity of CODE PAKISTAN's work. I understand I must declare any previously existing relationships with programme participants/beneficiaries to my line manager or HR manager. I will seek guidance on this prohibition from appropriate management.
5. Request any service or sexual favour from participants of CODE PAKISTAN programmes, children or others in the communities in which CODE PAKISTAN works, and will not engage in sexually harassing, exploitative, or abusive relationships.
6. Support or take part in any form of sexually exploitative or abusive activities, including, for example, child pornography, trafficking of human beings or child marriage.
7. Hire children for domestic or other labour, which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities or which places them at significant risk of injury or exploitation.
8. Use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.

ANNEX 2 - Definitions

A Child

A child is any individual under the age of 18.

Adults experiencing vulnerability

Anyone 18 years or over who:

- Is unable to take care of themselves/protect themselves from harm or exploitation;
- Is deemed to be at risk due to their gender, mental or physical health, disability, ethnicity, religious identity, sexual orientation, economic or social status, or as a result of disasters and conflicts;
- Is in a situation of subordination and, therefore, experiencing a power differential putting them at risk

Sexual Harassment

Sexual harassment is any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment. While typically involving a pattern of behaviour, it can take the form of a single incident.

Sexual Exploitation

Sexual exploitation means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

Sexual Abuse

Sexual abuse means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Child Exploitation and Abuse (involves one or more of the following)

a. Physical abuse

Physical abuse occurs when a person purposefully injures or threatens to injure a child. This may for instance, take the form of slapping, hitting, punching, shaking, kicking, beating, burning, shoving or grabbing. Physical abuse can be a single or repeated act. It doesn't always leave visible marks or injuries.

b. Emotional abuse

Emotional abuse is inappropriate verbal or symbolic acts toward a child or a pattern of failure over time to provide a child with adequate non-physical nurture and emotional availability. Such acts have a high probability of damaging a child's self-esteem or social competence.

c. Neglect

Neglect is the failure to provide a child (where they are in a position to do so) with the conditions that are culturally accepted as being essential for their physical and emotional development and well-being.

d. Sexual Misconduct with a Child

Sexual Misconduct with a Child is any form of sexual activity with a child. It is evidenced by an activity between a child and an adult or another child who by age or development is in a relationship of responsibility, trust or power, the activity being intended to gratify or satisfy the needs of the other person. It may include, but is not limited to, contact or non-contact activities, the inducement or coercion of a child to engage in any sexual activity, the use of a child in

prostitution or other sexual practices, or exposing a child to online sexual exploitation material, the use of children in pornographic performances and materials, or taking sexual exploitative images of children.

e. Grooming

Grooming generally refers to behaviour that makes it easier for an offender to procure a child or vulnerable adult for sexual activity. It often involves the act of building the trust of children and/or their carers or a vulnerable adult, to gain access to them in order to sexually abuse them. For example, grooming includes the provision of, or attention paid to a specific child or adult, providing gifts, money, drugs or alcohol to them, encouraging romantic feelings or exposing them to sexual concepts through conversation or exposure to pornography. Online grooming is the act of sending an electronic message, series of messages or engaging over an online platform with content that may be of an indecent nature, with the intention of procuring the recipient to engage in or submit to sexual activity with another person, including but not necessarily the sender. Both children and vulnerable adults can be victims of grooming and online grooming, with children being particularly targeted by online groomers.

Safeguarding

The measures we take to prevent, report, and respond to harm or abuse and to protect the health, well-being and human rights of anyone that comes into contact with CODE PAKISTAN, whether it is CODE PAKISTAN Employees and Related Personnel, partners, programme participants and communities.

Community Volunteer

Persons from the local community where CODE PAKISTAN is working and who undertake tasks for CODE PAKISTAN on a voluntary nature.

Incentive Worker

A person who is provided an incentive to do tasks for CODE PAKISTAN that have a temporary and voluntary character. Incentive workers may, for example, be people with refugee status, internally displaced peoples, returnees, or members of the host community, who are working for CODE PAKISTAN by doing tasks in return for incentives.

Visitors

Refers to a range of persons who are visiting CODE PAKISTAN offices or programmes, including donor representatives, journalists, media, researchers, celebrities, family members.