Safeguarding Framework

The Resource and Support Hub

Owner: Emma Wokowu, Team Leader

Date: November 2023

How do I report a concern?

RSH stakeholders are encouraged to report a safeguarding concern to the safeguarding points of contact to the Representative or at overall programme level using: reports@rshub.org.uk

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Policy Review Controls

Policy Details	
Name of Policy	Safeguarding Framework
Owner of Policy	Emma Wokowu (emma.wokowu@rshub.org.uk)
Date approved by Board	Approved by ESC March 2022
Key related documents	Options Child and Adult At Risk Safeguarding Policy, Options Code of Conduct, RSH Operational Manual, RSH Ethical Framework

Version Control		
Version Number	**Summary of key changes**	**Date of Approval by Board**
1.1	Replaced reference to DFID with FCDO; added Translators without Borders to named consortium organisations; referenced key documents such as the Operational Manual and Ethical Framework; added specific reference to new or high risks such as mentors and online risks; added specific responsibilities for STTA, added details of Online Hub reporting mechanisms; and additional annexes of previous content.	March 2022

Acronyms

CSO	Civil Society Organisation
ESC	Executive Steering Committee
FCDO	UK Foreign, Commonwealth and Development Office
GCPS	GCPS Consulting
GBV	Gender-Based Violence
GBP	Great British Pound
MENA	Middle East and North Africa
NEB	National Expert Board
PSEA	Protection from Sexual Exploitation and Abuse
RSH	Resource and Support Hub
SC	Steering Committee
SDDirect	Social Development Direct
SSC	Safeguarding Steering Committee
STTA	Short Term Technical Assistance
SEAH	Sexual Exploitation, Abuse and Sexual Harassement
TdH	Terre des Hommes
TWB	Translators without Borders
UN	United Nations
UNCRC	United Nations Convention on the Rights of the Child

1. Background and rationale

1.1. What is safeguarding?

RSH subscribes to the following definition of safeguarding in the international aid sector:

> **Safeguarding is an ethical approach and set of practical measures adopted by organisations to promote the safety and wellbeing of everyone involved in the delivery and receipt of humanitarian aid and development assistance, and to protect them as far as possible from all forms of harm, including sexual exploitation and abuse and sexual harassment, that might result from engagement in aid sector initiatives.**

Or put simply: We do not harm people who come into contact with us.

The Hub also uses the following international definitions for related concepts:

Sexual Exploitation: Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. Includes profiting monetarily, socially, or politically from sexual exploitation of another. Under UN regulations it includes transactional sex, solicitation of transactional sex and exploitative relationship.[1]

Sexual Abuse: The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It includes sexual assault (attempted rape, kissing / touching, forcing someone to perform oral sex / touching) as well as rape. Under UN regulations, all sexual activity with someone under the age of 18 is considered to be sexual abuse, regardless of the age of majority or consent locally. Mistaken belief in the age of a child is not a defence.[2]

Sexual Harassment: A continuum of unacceptable and unwelcome behaviours and practices of a sexual nature that may include, but are not limited to, sexual suggestions or demands, requests for sexual favours and sexual, verbal or physical conduct or gestures, that are or might reasonably be perceived as offensive or humiliating.[3]

SEA is a breach of the provisions of the UN Secretary General's Bulletin (Special measures for protection from sexual exploitation and sexual abuse), and is "Conduct or behaviour of a sexual nature when this conduct or behaviour amounts to either sexual exploitation or sexual abuse as defined in ST/SGB/2003/13".[4]

Protection from Sexual Exploitation and Abuse (PSEA) is the term used by the UN and NGO community to refer to measures taken to protect people from sexual exploitation and abuse by their own staff and associated personnel.[5]

Safeguarding is primarily a preventative approach and involves organisations meeting their responsibilities as defined in international laws and instruments, national codes and organisational policies. Safeguarding means treating everyone with dignity and fairness and creating environments and relationships between colleagues and between staff and community members that are respectful.

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[1] United Nations (2017) Glossary on Sexual Exploitation and Abuse. Second Edition. (https://hr.un.org/sites/hr.un.org/files/SEA%20Glossary%20%20%5BSecond%20Edition%20-%202017%5D%20-%20English_0.pdf)

[2] Ibid.

[3] United Nations (2018) Intensification of efforts to prevent and eliminate all forms of violence against women and girls: sexual harassment (A/RES/73/148). UN General Assembly Resolution. (https://digitallibrary.un.org/record/1660617?ln=en)

[4] UN, 2017.

[5] CHS Alliance (2017) PSEA Implementation Quick Reference Handbook (https://d1h79zlghft2zs.cloudfront.net/uploads/2019/07/PSEA_Handbook.pdf)

1.2. Objectives of the Framework

As Options is the contractual lead for RSH, the programme must comply with the safeguarding provisions set out in Options' policies, namely the Child and Vulnerable Adult Safeguarding Policy and Code of Conduct (Rev. Feb. 2022). The code of conduct can be found in Annex 1.

In line with the contractual agreements, all staff and associates contracted to deliver work on RSH are required to comply with the safeguarding provisions set out in Options policies, as well as any additional provisions set out by their employing organisation in the consortium. In the case of a breach, where it relates to staff or associate of a consortium organisation, the point of contact in the consortium organisation will be notified by the RSH Deputy Team Leader and agreement would be reached on how to proceed and who would be involved in the case management team.

In order to make sure that there is consistency between the different consortium partners, the programme has developed this Safeguarding Framework to draw together the main elements of the programme's commitment and approach to safeguarding, while ensuring it is relevant to this specific programme.

This Safeguarding Framework outlines RSH's overarching approach to safeguarding against SEAH. The Framework:

- Complements the standards set by Options' safeguarding policies by providing context and programme-specific guidance to the programme team, including on reporting. The framework does not replace Options' existing policy.
- Outlines how RSH's commitment to safeguarding will be implemented and managed across the programme to ensure donor compliance.
- Outlines clear roles and responsibilities within the RSH team for different aspects of the safeguarding commitment that the programme has made.

1.3. Our Safeguarding Principles

The RSH approach to safeguarding is guided by a number of principles. These principles are aligned with FCDO's safeguarding principles[6] as well as RSH's own Ethical Framework whereby 'We strive to Do No Harm' is a central tenet.

- Everyone has responsibility for safeguarding.
- We do no harm.
- Organisations have a safeguarding duty of care to beneficiaries, staff and volunteers, including where downstream partners are part of delivery. This includes children and adults in the community who are not direct beneficiaries but may be vulnerable to abuse.
- Act with integrity, be transparent and accountable.
- Act in a way that seeks to care for and protect the rights of children and adults and act in their best interests.
- A child is defined as someone under the age of 18 in line with The United Nations Convention on the Rights of the Child (UNCRC).
- All individuals (including children and adults) shall be treated equally, irrespective of ethnicity, colour, gender, religion/or none, sexual orientation or disability or other aspect of identity.
- Organisations that work with children and/or adults should apply a safeguarding lens to their promotional communications and fundraising activities.

[6] Guidance: Enhanced Due Diligence: Safeguarding for external partners (updated 30 January 2020) https://www.gov.uk/government/publications/dfid-enhanced-due-diligence-safeguarding-for-external-partners/enhanced-due-diligence-safeguarding-for-external-partners#principles-of-safeguarding

- Survivor-centred by prioritising the needs and wishes of the survivor.[7]
- Use information and resources in a safe and responsible way. This includes the exercise of due care in all matters of official business, and not divulging confidential information.
- Ensure that personal and professional conduct is, and is seen to be, of the highest standard and in line with the Code of Conduct.
- Never engage in any abuse or exploitative relationships – sexual, emotional, financial or employment-related.
- Refrain from any involvement in criminal or unethical activities or that contravene human rights.
- Ensure that another adult is present when working in the proximity of children and also adults where they may be at risk or vulnerable.

1.4. Code of Conduct

All RSH staff and associates are required to meet the expectations set out in the Options Code of Conduct (Annex 1) as well as any additional expectations in the Code of Conduct of their employing organisation. Appropriate action will be taken against staff who breach the code, including disciplinary action in line with the established processes of the employing organisation and/or referral to relevant authorities for appropriate action where necessary.

All staff and associates are required to sign up to the Code of Conduct as part of their contract and as part of the declaration form that is returned to the RSH safeguarding point of contact.

1.5. Scope

This Framework applies to all RSH individuals employed on a full or part time contract in the UK or overseas, consultants and mentors contracted through the STTA pool and individual members engaging with the programme through governance structures such as the Executive Steering Committee (ESC), the Steering Committee (SC) and the National Expert Boards in each National Hub (NEB). These are collectively referred to as 'team members and associates' in this Framework.

Although the SC and NEB are not contractually employed by the programme, they are required to abide by the Safeguarding Framework, which include the annexes, if they are going to engage with the programme. Breach of the Safeguarding Framework is grounds for removing them from the governance body and informing the relevant bodies (e.g. either their organisation or the authorities) depending on the nature of the complaint.

Detail on the due diligence carried out on our team members and associates is detailed in the RSH Operational Manual. We will work with the entire team to ensure collective ownership of the safeguarding policies and processes, and their understanding and support for the Code of Conduct.

1.6. Who is at increased risk of harm?

RSH acknowledges that there are potential risks to specific groups through our work. In order to best protect those most at risk, RSH will adopt an inclusive, survivor-centred, child-centred and Do No Harm approach at all times.

The following groups are amongst those generally recognised as at increased risk of safeguarding incidents as well as those who are identified as being most at risk on the RSH programme specifically:

- Girls and boys under the age of 18;
- Young people from the ages of 18 to 24;

[7] See Figure 2 in 4.3 for further detail around how we practically approach this principle on RSH.

- Elderly in particular older women and those living with different forms of disabilities who lack attention and information on rights;
- Children and adults affected by mental health issues or who live with disabilities;
- Marginalised populations including sexual minorities, poor women and socially excluded groups;
- Women who have experienced gender-based violence (GBV), including victims and survivors of SEAH;
- Direct recipients of our services, such as mentors who receive mentorship training from RSH staff and provide direct mentoring support to other organisations in National Hub countries;
- Researchers and participants directly engaging in research activities for RSH, such as end user engagement research and larger research pieces; and
- Online Hub users exposing themselves to specific risks online.

Risk assessments will be carried out and regularly revised at Global and National Hub level to take into account the specific risks of each programme activity in order to inform appropriate and contextualised mitigation measures and feedback mechanisms.

In addition to social safeguarding, we will ensure that environmental considerations are mainstreamed throughout our programme operations in line with FCDO's Supplier Code of Conduct. We will use tried and tested tech solutions to convene our global network, keeping the number of international flights to a minimum.

2. Safeguarding measures for RSH

The framework also practically sets out roles and responsibilities for implementing different aspects of the policy and meeting the commitments described above.

The purpose of applying a Safeguarding Framework is to prevent harm from occurring and to respond appropriately when actual or potential harm or allegations of harm do occur. RSH will achieve this by having clear lines of accountability and specific roles and responsibilities for safeguarding across the programme that are clear and contextually relevant.

2.1. Roles and responsibilities for safeguarding

Role	Responsibility
Executive Steering Committee (ESC)	The ESC consists of CEO or senior staff from consortium organisations and the FCDO Safeguarding Unit and Bethany Brady (Options) is the Safeguarding Designated Lead. • Key responsibilities include: approving the Safeguarding Framework and being notified of any updates and changes thereafter; being notified of alleged violations to the Safeguarding Framework (see section 4.5); reviewing safeguarding risk management at bi-annual meetings.
Safeguarding Steering Committee (SSC)	The SSC consists of RSH staff in delivery roles across the consortium, including the Team Leader and Senior Technical Advisor. • Key responsibilities include: ensuring that safeguarding processes are implemented across the whole programme, reviewing the safeguarding workplan and developing procedures to improve processes. • The Senior Technical Advisor will quality assure the Safeguarding Framework and serve as an advisor to members of the team with key roles as they seek to implement the Framework.
Team Leader (TL)	• Ultimate accountability for the programme's safeguarding to FCDO. • Accountability to operationalise the Framework within the RSH programme as the overall programme safeguarding point of contact. • Key responsibilities include: delivering induction and refresher training to RSH staff and associates, receiving and coordinating responses to safeguarding cases, supporting National Associates in their role as in-country safeguarding point of contacts and monitoring the implementation of safeguarding policies.
Safeguarding Specialist(s) from the STTA	• Provide technical support to the TL as and when needed, including on case management and investigations.
Regional Associates (RA)	• Ensuring the Safeguarding Framework is implemented in target countries and supporting NAs to carry out risk assessments that consider contextual risks.

National Associates (NA)	• The national safeguarding point of contact for concerns emerging from country level activities and escalating to the TL. • Responsibilities include: carrying out safeguarding risk assessments that consider contextual risks, raising awareness and ensuring reporting mechanisms are clearly visible at national level, training country level staff and associates and monitoring awareness, functionality and safety of reporting mechanisms and identifying referral pathways.
All RSH Team Members	• Comply with Options' policies, this Safeguarding Framework as well as any additional expectations in the Code of Conduct of their employing organisation. • Escalate all concerns immediately to the TL or as per stated procedure.

2.2. Research, evaluation and monitoring

RSH ensures high ethical standards in our research and is informed by FCDO's ethics principles and standards for research, evaluation and monitoring.[8] Any ethical and safeguarding risks associated with research will be carefully considered in risk assessments and escalated to the programme Risk Register as appropriate with mitigation strategies included. Where necessary, these risks will be escalated to a dedicated ethics committee for approval. This committee comprises senior members from across the consortium as well as the DFID's Research and Evidence Division (RED) where possible. We will also abide by the research protocols of any country where we are conducting research, ensuring the right approvals are in place.

2.3. Risk management

RSH has comprehensive risk management processes in place to ensure that risks associated with any activity are properly assessed, mitigated and monitored, including the risk of harm to adults and children as a result of our programme. Safeguarding risks that are identified at national and central level are integrated into the programme risk register and reviewed by the SSC and presented to the ESC at quarterly meetings. The Project Manager is accountable for risk management across the consortium.

2.4. Communication guidelines

RSH may use photographs in its external communications, including on the Online Hub, webinars, newsletters and social media. However, where universal consent has been obtained, RSH will only use photographs where people are not identifiable/faces are not shown. This is due to the potential protection risks of publishing photographs of people, including women, adolescent boys and girls and children, on an issue as sensitive as SEAH and the fact that RSH is not likely to generate its own photographs where the nature of consent can be fully guaranteed. Sensitivity and caution will always be exercised when determining the appropriateness and suitability of images being used and in the longer term, RSH will increase the use of graphics, diagrams and illustration and prioritise this over the use of photographs.

Any concerns regarding inappropriate use of the images should be reported in accordance with the normal process for a breach of the Safeguarding Framework.

2.5. Safe recruitment

RSH has a core team of staff hired by each consortium organisation with specific roles. Each of these individuals will undergo a criminal record check and personnel screening in line with respective HR processes.

[8] See FCDO ethical guidance for research, evaluation and monitoring activities (May 2019) available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/838106/DFID-Ethics-Guidance-Oct2019.pdf

RSH will also rely on individual consultants in the STTA pool to support with the overall delivery and to carry out discreet pieces of work. These consultants are contracted primarily by SDDirect but may be contracted by any consortium partner. Consultants will deliver in-country or desk-based work, across the life of the project. Each organisation is responsible for carrying out the due diligence process on the consultants it contracts and adds to the STTA. An annual due diligence is conducted with all partners to ensure processes remain relevant.

RSH will also consult with individuals through the ESC, SC and NEB. These individuals are not contracted but receive an optional honorarium for engaging with the programme at key and regular meetings.

While the process will differ slightly across each group and consortium, the standard process on vetting and due diligence is outlined in the RSH Operational Manual. In includes stating our commitment to safeguarding in the Scope of Work, carrying out reference and criminal background checks and inducting them on the Safeguarding Framework.

2.6. Awareness raising

In order for reports to be made and action to be taken, it is essential that the Core RSH team, associates and end users are aware of RSH's safeguarding commitments and the processes for raising concerns or complaints. RSH will raise awareness of the Framework in the following ways:

- Conduct in-depth training and yearly refresher training for all core team members on the Safeguarding Framework, including the Code of Conduct, to make sure that staff are confident about their duties and know what and how to report and escalate.
- Conduct induction training for all individuals in governance groups and consultants on the STTA pool, including mentors, on the Safeguarding Framework, including the Code of Conduct, to make sure that individuals and consultants are aware of their duties and know what and how to report and escalate.
- Raise awareness at country-level to CSOs, including organisations receiving support from mentors, and others engaging with the programme about our commitment to safeguarding and the duties of RSH staff and associates. This will include information about local feedback and complaint mechanisms available to report in country. This will be done verbally as well as through visual aids where appropriate. It will also be included within communications materials such as presentations, print and email.
- Raise awareness to users at large through the Online Hub website by providing a copy of the Safeguarding Framework in multiple languages as well as information and the ability to report any suspicions across the programme online, including the option to report anonymously and in multiple languages.

2.7. Monitoring awareness and compliance

Monitoring how the consortium is implementing the Safeguarding Framework will be an important component to ensure that the RSH team has effective mechanisms in place and is able to learn lessons about what is working and what is not in relation to rolling out safeguarding for the programme.

Monitoring will be carried out by the TL on a bi-annual basis and findings will be reviewed by the SSC and used to inform updates to the safeguarding workplan. Key monitoring activities will look at:

- Whether the programme's Safeguarding Framework is being implemented
- Whether staff are aware and confident about their safeguarding duties
- Whether staff are aware and confident about how and what to report and escalate

RSH will ensure learning is emphasised within its safeguarding approach. On an annual basis, RSH staff and associates will be asked to reflect on their experience of implementing safeguarding in the programme. This will allow the programme to adapt and improve our approach, such as revising procedures that are not effective or appropriate in practice.

2.8. Procurement

RSH requires all its partners and contractors to work in ways that are consistent with the principles and practices described in this Framework. In order to support compliance, the Safeguarding Framework will be written into

contracts including the requirement to act in accordance with the Code of Conduct and to report safeguarding concerns to the safeguarding point of contact within 24 hours. Compliance may be monitored at any time throughout.

3. Responding to safeguarding concerns

3.1. Identifying a safeguarding concern

All RSH team members and associates will be inducted on the Safeguarding Framework, with refresher training to be provided every year. A note of who has attended the training will be kept by the Team Leader. This training will include how to deal with a disclosure if one is made and how to report allegations of abuse or breaches of safeguarding policies including digital Sexual Exploitation Abuse and Harrassment.

3.2. Reporting a safeguarding concern

Staff members and associates are encouraged to report a safeguarding concern to the safeguarding points of contact at national level (the National Associate) or at overall programme level (Team Leader) using the reports@rshub.org.uk email address managed exclusively by the TL of the Resource and Support Hub project.

If a staff member does not feel comfortable reporting directly to these points of contact, they can report their concern to the Technical Director Andrea.Watkins@rshub.org.uk to their email address. Reporting is also available on the Online Hub website. Reports can be made anonymously and will be directed to reports@rshub.org.uk.

In addition, RSH follows a **Speak Up approach** whereby it encourages staff to raise concerns and provides multiple reporting channels in order to reduce any potential barriers to reporting. It is therefore possible for RSH staff to report using **FCDO's Reporting Concerns** inbox at reportingconcerns@fcdo.gov.uk or confidential reporting hot line +44 (0)1355 843 747.

Any disclosure of abuse received from externals i.e. survivors, whistle-blower will directed to the TL of the Resource and Support Hub project for further action.

The National and Regional Associates will support the survivors by referring the survivor to an established functional referral system in the country. This will include disclosures received from remote areas. A referral system should apply best practice of

The NA and RAs will also establish collaboration with the United Nations In-Country PSEA Networks or Gender-Based Violence Clusters to enable survivors to access immediate victim assistance services. Where an ICN PSEA system or GBV cluster does not exit, they will find what is applicable in country or location.

RSH global will set up a global Standard Operating Procedures (SOP), that will be contextualised at the country level.

pathways where possible, that are contextually appropriate. These will be agreed at the kick-off meeting in each national office.

4. Case Management of the Victim/Survivor

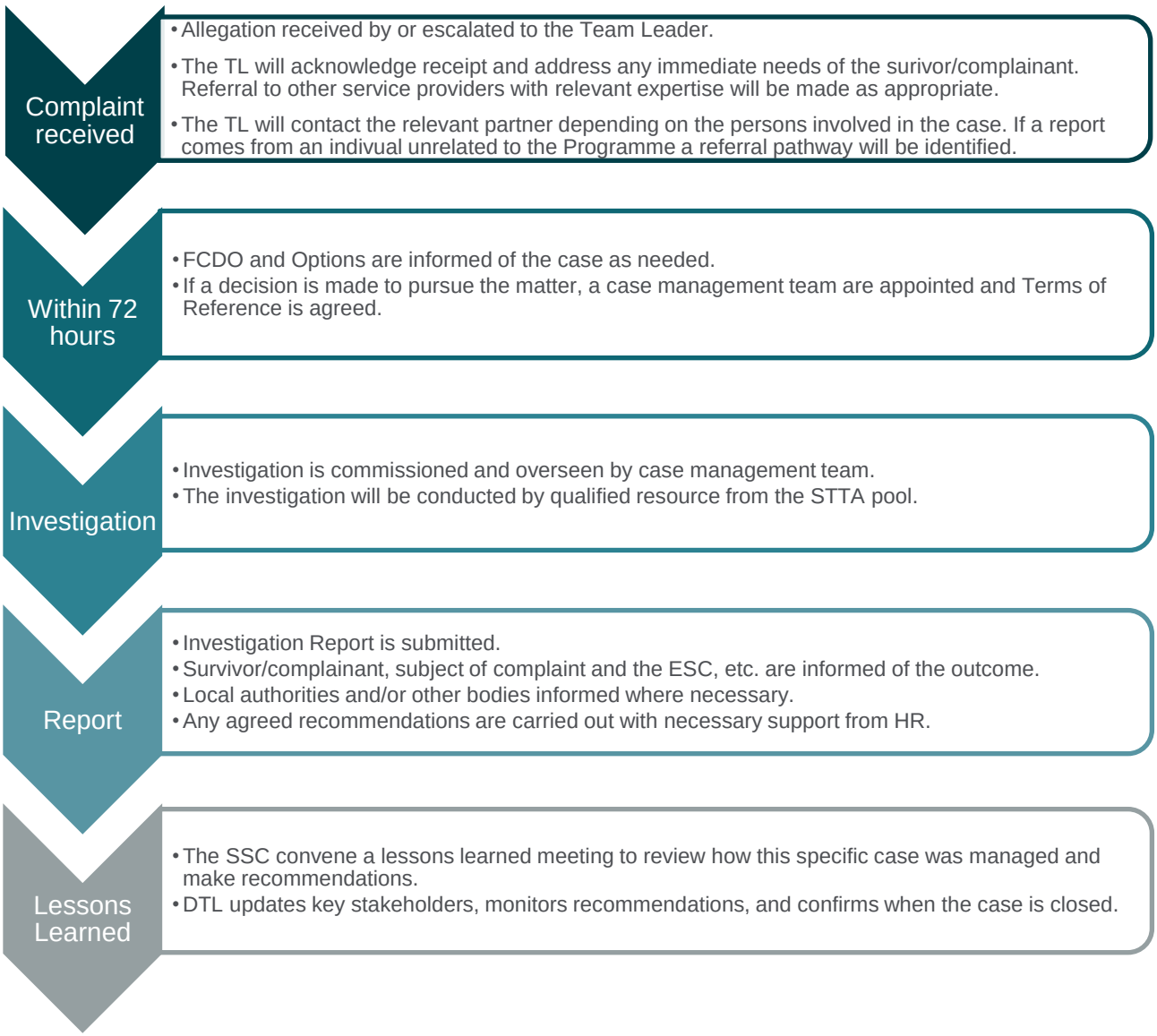
4.1. Case Management

Being survivor-centred, the programme will look at the further risks it could expose the survivor to before reporting cases to the authorities. Based on this, the Team Leader will always act in accordance of the wishes of the survivor, including when deciding whether to report the case to the authorities. The only exception to this is if the survivor is a child under the age of 18 where RSH has an obligation to report. In the case of disclosures involving a member of a government run institution, the consortium will refer to the strong referral mapping

developed at country level by the NAs while also potentially reaching out to FCDO as a mediator. This will ensure the good management of any reporting to the authorities and the consideration of political risks.

The case management team is made up of a small number of individuals within the consortium. This group is responsible for making an assessment of the case and deciding next steps, such as whether further information gathering is required, whether an investigation needs to be commissioned, who should lead and/or be involved in the investigation, and whether the relevant authorities should be informed.

Investigation of alleged or suspected cases will apply the international standards as laid out by the Core Humanitarian Standards.



4.2. Confidentiality and information sharing

While it is important to ensure that the donor and consortium organisations are kept informed of incidents and breaches of the Safeguarding Framework, this must be done in line with relevant legislation including the Data Protection Act 2018 as well as statutory guidance.[9] With regards to consortium organisations, it must be done on a 'need to know' basis. This is essential in order to maintain the confidentiality of survivors/complainants and other parties, particularly where they may be at risk.

[9] For example, see working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children July 2018

Options and FCDO will be informed of all safeguarding reports that are received relating to a consortium organisation within 72 hours. This will be an initial notification in line with legislation, pending details of a full investigation.

Should the safeguarding report relate to staff or associates of a consortium organisation, the point of contact in the consortium organisation will be notified by the Team Leader and agreement would be reached on how to proceed and who would be involved in the case management team. While the Team Leader will not necessarily be part of the internal safeguarding processes, s/he will be kept informed on the status by the partner in order to ensure the report is dealt with in a satisfactory manner. If the Team Leader is not satisfied that a safeguarding incident is appropriately dealt with by a partner, s/he will notify the Senior Technical Adviser for further advice.

Depending on the nature of the case and the degree to which the incident relates to RSH activity or may impact on the reputation of the RSH, other consortium partners with no direct relevance to the safeguarding incident will be informed via the ESC that a safeguarding report relating to a consortium partner has been received and is being dealt with.

A final notification on outcomes in line with legislation will be communicated to Options and FCDO, as well as to consortium partners where appropriate via the ESC.

Annex 1: Code of Conduct

Introduction

We are a global team of experts and innovators tackling some of the world's most pressing health challenges.

Since 1992, we have worked in more than 60 countries. With longstanding connections in the places we work, our approach is sustainable and adaptive. This means we are flexible enough to respond quickly whilst also supporting locally rooted solutions. We believe this is vital to ensuring a lasting positive impact.

Gender equality and social change are at the forefront of our work. As part of MSI Reproductive Choices, all our profits go back into supporting MSI's own mission of children by choice, not chance

This Code of Conduct describes the actions and behaviours that enable and ensure Options carries out its business in a sustainable way for the benefit of our communities we work with and end users, and so that the employment experience is a positive one for all our team members. This Code is designed to support the values and behaviours of Options by highlighting the principles and themes that ensure Options manages its day to day activity in line with the needs of team members, partners, collaborators, stakeholders and communities we work with. Options aims to be an inclusive organisation where diversity is valued.

Scope

This document applies to all team members; "team members" are individuals who are directly employed by Options or via an Employer of Record (EOR) on behalf of Options. Although this Code applies to the work of Options, team members are reminded that their behaviours outside the working environment may also have the potential to harm the company, in circumstances where those behaviours breach either regulated or accepted standards.

Team members are provided with a copy of this document via Cezanne along with a declaration for e-signature during the induction process to acknowledge agreement to the terms of this Code.

Our Code

Options Organisational Standards

- We always focus on the end user and respect the rights of communities we work with to safe, efficient, confidential, and inclusive high-quality services. Options believes that communities we work with are experts in their own experience and should be active partners in making decisions about their health.
- We conduct our work with honesty and professional ethics, maintaining a high level of integrity and openness and with respect for the interests of our key stakeholders including communities we work with, the communities in which we work, anyone who benefits from the work Options does, team members, partners, national governments, donors, and suppliers.

- We safeguard and protect the rights of children and adults at risk with whom we interact in the course of our operations. This includes a commitment to preventing all forms of harm or abuse, specifically, sexual abuse and/or exploitation of communities we work with or other stakeholders.
- We uphold the elimination of all forms of forced and compulsory labour for everyone and we do not tolerate the trafficking and slavery of people, for example the use of sex workers (more examples of conduct or behaviour that are not tolerated can be found in the Child and Adult at Risk Safeguarding policy).
- In each of these cases, Options operates a "zero tolerance" approach to Safeguarding violations and those relating to trafficking and slavery of people. Zero- tolerance means all reports relating to safeguarding and trafficking and slavery of people will be reviewed and responded to in line with global anti-modern day slavery and human trafficking policy and local legislation.
- We operate a "zero tolerance" approach to fraud and bribery. All reports relating to fraud and bribery will be reviewed and responded to in line with global anti-fraud and bribery policy and local legislation.
- We respect confidentiality and protect information in accordance with relevant legislation and internal policies. Options does not misuse information or data (including personal data relating to individuals) in such a way as to cause detriment to the reputation of the organisation, the services that Options provides, or to any communities we work with, colleagues, or stakeholders.
- We are committed to building and supporting an inclusive working environment that promotes diversity, equity, and equality of opportunity, where there is respect for human rights and no discrimination based on age, disability, socio-economic status, religion, race, caste, ethnic group, gender identity or expression, sex as assigned at birth, sexual orientation, or any other protected characteristics.
- We are committed to building a more inclusive organisational culture and treating team members with respect and dignity throughout the employment lifecycle.
- We are committed to a safe and healthy working environment, free from discrimination, bullying, harassment or abuse of any kind.
- We respect the rights of individuals to raise legitimate concerns without fear of reprisal, through transparent, fair and confidential procedures.
- We comply with our statutory obligations in every country where we have a presence.
- We respect the rights of our team members not to be discriminated against in relation to any protected characteristic. A protected characteristic is one that an individual can lawfully rely on within the jurisdiction concerned to ensure equality or equal treatment in relation to their employment. Protected characteristics vary from country to country and we provide everyone with the opportunity to raise any concerns.
- We value the work that is carried out by every one of our team members.

Options Team members commitments

- Options team members must be sensitive to power imbalances and must not misuse the power they hold for exploitation or abuse, or to seek gain for themselves or others. This includes not participating in a relationship of a sexual nature with a child under the age of 18 years, any recipient of Options services or support and not engaging the services of sex workers.

- Options team members must act in a respectful manner with all colleagues and seek to contribute to a positive and supportive work environment (see also Dignity at Work policy, here).
- Options team members must share the organisations commitments to equality, diversity and inclusion and safeguarding children and vulnerable adults. Team members must treat colleagues, communities we work with, and all stakeholders with fairness, dignity and respect.
- Options team members must not take part in any form of discrimination, harassment, or abuse (physical, sexual or verbal).
- Options team members must not accept inducement or gifts in contravention of our policies or take part in fraud or bribery of any description, including the receipt or payment of facilitation payments.
- Options team members must avoid personal activities and financial interests which could conflict with their responsibilities toward the organisation and seek to ensure that all possible conflicts of interest are declared.
- Options team members must declare any personal, intimate or other close relationships (e.g. family) as a conflict of interest so any actual, potential or perceived bias can be managed in line with global policy.
- Options team members have a responsibility to ensure data integrity and that all information produced by Options is truthful. When handling electronic or data on paper forms, team members must apply data protection standards to protect it from misuse.
- Options team members are expected to report all suspected or known incidents of discrimination, abuse, misconduct, trafficking and slavery of people or any other breach of this code of conduct.

Compliance with these standards is essential to Options mission

Options takes a zero-tolerance approach to all confirmed breaches of this Code. In the event of any apparent breach of this code, Options will investigate the allegations and consider the evidence, regardless of the circumstances, if there is a case to answer.

If there is a case to answer, the process will be managed in line with the disciplinary procedures, and/or any other process or procedure that might apply in the circumstances. Consequent disciplinary action may be taken, up to and including dismissal from the organisation.

An individual who wishes to raise a concern in relation to all suspected or known incidents of discrimination, abuse, misconduct, trafficking and slavery of people or another possible breach of this Code should raise those concerns informally in the first instance, with reference to the appropriate grievance policy. Alternatively, the concerns can be directed in confidence through our whistleblowing, safeguarding or grievance procedures.

Appendix 1: Options Values and Behaviours Our Culture and Values

- Applying flexibility in our approaches
- Promoting equity in our values
- Fostering innovation in our thinking
- Showing integrity in our actions
- Using the latest technologies in our solutions
- Making partnerships productive for all parties

- Being ambitious in delivering evidence and results

Options Core Behaviours

Work as One

- Contribute, use, and share accurate data and information to improve understanding, insight and decision-making across Options, enabling us to maximise our ability to influence others and deliver high quality services
- Share relevant knowledge, expertise and resources to strengthen teamwork and prevent duplication of effort
- Actively work as part of a team, providing support and flexibility to colleagues, demonstrating fairness, understanding and respect for all people and cultures.

Show courage, authenticity and integrity

- Hold ourselves accountable for the decisions we make and the behaviours we demonstrate
- Are courageous in challenging others and taking appropriate managed risks.

Develop and grow

- Seek feedback to enable greater self-awareness and provide the same to others in a way which inspires them to be even more effective.
- Manage our career development including keeping our knowledge and skills up to date.

Deliver excellence, always

- Strive to consistently meet and exceed expectations, putting communities we work with at the centre of everything, and implement smarter, more efficient ways of performing our roles
- Build and maintain effective long-term working relationships with all stakeholders, and be true Options ambassadors.