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MSIAP Adult Safeguarding and Protection from Sexual, Exploitation, Abuse and Harassment Policy

1.0 Introduction and Policy Objective

At MSI Reproductive Choices Asia Pacific (MSIAP) we recognise that living a life free from exploitation, abuse and harassment is a fundamental human right, and we have a duty of care to protect the safety and welfare of all those whom we interact with throughout our work; this includes our clients, the communities in which we work, and the staff and partners who support our work. MSIAP and MSIAP supported projects have a responsibility to operate in accordance with the principle of '*do no harm*' and take active measures to mitigate risks of people experiencing harm as a consequence of our work.

MSIAP has zero tolerance for sexual exploitation, abuse and harassment (SEAH) in all aspects of its work and zero tolerance for inaction to prevent and respond to SEAH. MSIAP recognises that abuse and exploitation are more likely to occur where individuals are in vulnerable situations and/or dependent on those who may seek to exploit their position of power for their own personal gain; and acknowledge the potential for an unequal balance of power between representatives and employees of MSIAP, MSIAP supported projects and/or anyone with a contractual link to MSIAP, and the clients and affected communities, they interact with.

Safeguarding is a way of working that promotes the safety and welfare of people involved in delivery of, or receipt of, humanitarian aid and development assistance and protects them from harm, including all forms of sexual exploitation, abuse and harassment.

This Policy aims:

- To establish a policy of zero tolerance to sexual exploitation, abuse and harassment and zero tolerance for inaction across MSIAP and all related personnel, including MSI Country Program staffs and projects funded by MSIAP, any individual or company contracted to MSIAP to conduct a service, including consultants and suppliers.
- To ensure that roles, responsibilities and expected standards of conduct to prevent and respond to sexual exploitation, abuse and harassment are known across and all related personnel, including MSI Country Program staffs and projects funded by MSIAP, any individual or company contracted to MSIAP to conduct a service, including consultants and suppliers.
- To create and maintain a safe environment, free from sexual exploitation, abuse and harassment, by taking appropriate measures internally and in the communities where MSIAP supported projects operate, through robust prevention, risk mitigation and response work.
- To establish the foundational framework of MSIAP to prevent and mitigate risks relating to sexual exploitation, abuse and harassment and take corrective action when a SEAH incident occurs.

2.0 Our commitment to Adult Safeguarding and PSEAH

2.1 MSIAP acknowledges that in the delivery of our services, there is a potential to increase safeguarding risks to adults, particularly in vulnerable situations, through how we conduct our programming, for example, whilst delivering clinical services in centres or outreach, through community engagement or whilst conducting research or data collection activities.

¹

2.2 All MSIAP People and all related personnel, including MSI Country Program staffs and projects funded by MSIAP, any individual or company contracted to MSIAP to conduct a service, including consultants and suppliers are therefore expected to uphold the highest ethical standards, both inside and outside of work, and to continuously strive to prevent all forms of exploitation, abuse, and harassment from occurring across MSIAP and MSIAP supported projects.

2.3 MSIAP recognises that everyone has the potential to experience vulnerability at some point in their lives and should be safeguarded from harm. Certain individuals may experience an increased risk of vulnerability to safeguarding risks, due to a variety of reasons which may include:

A reduced ability to engage or consent voluntarily due to:

- a dependent and/or unequal relationship, for example:
- where a client is dependent on a provider to carry out a service in a restrictive or stigmatised environment.
- where a team member is reliant on a manager for continued employment.

Coercion or undue influence, for example:

- by a partner, family member, a provider or anyone else in a position of influence or power.
- due to social norms where individuals may feel compelled to agree regardless of their personal preferences.
- due to a reduced capacity to understand and process information or communicate their opinions or decisions for example as a result of mental illness, intoxication.
- due to an inability to understand and/or speak the local language, or as result of trauma.

2.4 MSIAP takes our duty of care for safeguarding very seriously. In doing so we are committed to:

Safeguard Clients: by ensuring all clients are treated equally with dignity and respect. All projects supported by MSIAP aim to assess risks and work to actively minimise the likelihood of clients in vulnerable situations, experiencing intentional or unintentional exploitation, abuse, and harassment. Where exploitation, abuse or harassment does occur within our operations and MSIAP supported projects, MSIAP will respond quickly to support victim-survivors through a victim-survivor centred and trauma-informed approach and prevent ongoing and future risks of harm.

¹ Regarding research purposes, ethical guidance exists around special ethical considerations for data collection with minors to ensure that the benefits outweigh the risks.

Safeguard MSIAP People: by promoting a safe working environment. We do not tolerate exploitation, abuse, harassment, or discrimination against any MSIAP Person or Partner and are committed to quickly responding and taking necessary action if it does occur.

Safeguard MSIAP: by demonstrating a genuine commitment to safeguarding our clients and staff and preventing cases of abuse from happening. In doing so we continue to safeguard MSIAP's reputation and our ability to continue to deliver on our mission, for the ultimate benefit of the clients and communities we serve.

3.0 Scope

3.1 This Policy sets out MSIAP's standards and expectations in order to prevent and respond to any adult or children experiencing sexual exploitation, abuse, or harassment across MSIAP and all related personnel, including MSI Country Program staffs and projects funded by MSIAP, any individual or company contracted to MSIAP to conduct a service, including consultants and suppliers.

3.2 This Policy applies to:

All persons at MSIAP, including all employees, trainees, volunteers, sessional workers, board members and any other person associated or working under contract with MSIAP in any capacity (collectively, "**MSIAP People**", and individually, an "**MSIAP Person**").

And anyone with a contractual link to MSIAP, which includes:

All implementing partners, including implementing country program partners, external downstream partners and any third parties (including consultants and external implementing partners) receiving funds and/or any kind of support from MSIAP, including persons funded by MSIAP projects, any individual or company contracted to MSIAP to conduct a service, including consultants, social franchisees and suppliers).

All social franchisees supported by MSIAP

All visitors to MSIAP-supported projects or activities, including those conducted by implementing partners and contractors and/or downstream implementing partners/ sub-contractors, such as consultants, donors, researchers, photographers, videographers, journalists and supporters, or any other person visiting MSIAP-supported projects or activities for any purpose (referred to as "**visitors**")

3.3 Henceforth, any reference within this Policy to '**anyone with a contractual link to MSIAP**' applies to all these groups universally.

3.4 This policy applies both during and outside working hours. All forms of sexual exploitation, abuse or harassment, or any behaviour which could be seen to violate

the ethical standards of this policy will be investigated and responded to in line with Policy Section 7.1.1.

- 3.5 MSIAP has a responsibility to ensure that all MSI Country Programs, external downstream partners, social franchisees engaged in MSIAP funded projects or activity implementation develop their own Adult Safeguarding and PSEAH Policy, procedures and Code of Conduct and/or adopt MSIAP's Adult Safeguarding and PSEAH Policy, standards and procedures.
- 3.6 All MSIAP People, country programs, external downstream partners, social franchisees funded by or engaged with MSIAP funded projects or activities must comply with MSIAP Adult Safeguarding and PSEAH Policy and procedures. All visitors to MSIAP funded projects and activities or who are supported by MSIAP, must also comply with MSIAP Adult Safeguarding and PSEAH Policy.
- 3.7 MSIAP recognises that safeguarding concerns may relate to other types of harm and abuse in the workplace such as bullying, harassment and discrimination. These types of misconducts, alongside sexual harassment are addressed in detail within MSIAP's Employment Handbook.
- 3.8 This Policy does **not** provide guidance on responding to clients who have experienced sexual and gender-based violence (SGBV) within their community, nor does it provide guidance on specific counselling or consent procedures for adults in vulnerable situations seeking our services. For guidance on SGBV, counselling and consent please consult [MSI's Global Medical Development Team](#).
- 3.9 This Policy should be seen as part of a group of policies and guidelines which deal with the welfare of all those who come into contact with MSIAP, including our staff, partners, clients and the communities, in which we work and/or come in contact with MSIAP or MSIAP funded projects or activities, and must be therefore read in conjunction with the:

[MSI Code of Conduct 2024](#)

[MSI Child Safeguarding Code of Conduct 2025](#)

[MSIAP Child Safeguarding Policy 2026](#)

[MSIAP Communications Policy 2025](#)

[MSI Speak-Up Policy 2024](#)

[MSIAP Anti-Modern Slavery and Human Trafficking Policy 2025](#)

[MSIAP Risk Management Policy 2026](#)

[MSIAP Employee Handbook 2025](#)

[MSI's Policy on Client Counselling and Informed Consent](#)

[MSI's Duty of Care for Service Providers](#)

[MSI's Guidance on Safeguarding Clients and Staff During Site Visits](#)

[MSI Safeguarding Code of Conduct for Partners](#)

[MSI's Operational Guidance for SGBV](#)

[MSI Child Safeguarding Policy 2025](#)

[MSI Adult Safeguarding Policy 2025](#)

4.0 Key Definitions

For the purposes of the present policy:

- **Adult** – An individual 18 years and above.
- **Bullying and harassment** referring to offensive, intimidating, humiliating, or insulting behaviour towards someone for example, spreading malicious rumours, undermining someone or other forms of unfair treatment. This can occur in multiple forms, in-person or remote e.g., via phone, email, or social media.
- **Fraternalisation**: Any intimate or social relationship in the course of conducting business that can give rise to preferential treatment or improper use of rank or position.
- **Sexual Exploitation** – Any actual or attempted abuse of position of power or trust for sexual purposes (for example, asking a person to engage in sexual activity in order for them to obtain a service or employment) including, but not limited to, the exchange of money, employment, goods or services for sex, including sexual favors.
- **Sexual Abuse** – The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It covers sexual offences, including but not limited to, attempted rape (which includes attempts to force someone to perform oral sex); and sexual assault (which includes non-consensual kissing and touching). All sexual activity with someone under the age of consent is considered to be sexual abuse.
- **Sexual Harassment** – Any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any behaviour of a sexual nature that might reasonably be expected, or be perceived, to cause offence or humiliation to another.
- **Transactional sex**- The exchange of money, employment, goods or services or other advantages for sex or sexual acts, even in places where sex work is legal.
- **Technology-facilitated sexual exploitation and abuse** meaning the use of technology or the internet to facilitate the sexual exploitation of adults in vulnerable situations, including the production and sharing of sexual abuse material online. The most common forms of online sexual exploitation include grooming, live streaming, and coercing and blackmailing adults in vulnerable situations for sexual purposes.
- **Trauma-informed approach** refers to being aware of the impacts of trauma on victim-survivors and responding in ways that are sensitive and better support them.
- **Victim-survivor**: The term recognises both the harm and trauma experienced (victim) and the strength and resilience of those who continue to live with and recover from abuse (survivor). It also acknowledges that not everyone survives abuse.

5.0 Guiding Principles

MSIAP's commitment to Adult Safeguarding and PSEAH is guided by the following guiding principles:

- 5.1 **Zero tolerance for sexual exploitation, abuse and harassment:** MSIAP does not tolerate any form of sexual exploitation, abuse, or harassment by anyone who works for, or is associated with the organisation in any capacity. All representatives of MSIAP, including anyone with a contractual link to MSIAP, are therefore expected to uphold the highest ethical standards when interacting with clients and affected communities in both a professional and personal capacity.
- 5.2 **Promote inclusion, equity and non-discrimination:** MSIAP is committed to supporting the well-being of all clients and community members, and safeguarding them regardless of their gender, age, nationality, ethnicity or caste, sexual orientation, religious or political belief, occupation, socio-economic status, disability status, marital status or any other characteristic. Efforts must address barriers to participation, protection, reporting and support such as language, safety, discrimination and accessibility.
- 5.3 **Prioritise a victim-survivor centered and trauma informed approach across the receipt, management and response to sexual exploitation, abuse and harassment allegations:** A victim-survivor centered approach puts the safety, rights, wishes, dignity and wellbeing of the victim-survivor first – above organisational reputation or convenience. A trauma-informed approach recognises how trauma affects people's behaviour and decision-making and responds with care, flexibility, and respect. All reported violations of this policy will be managed in a way which prioritises the best interests of the victim-survivor. Assistance and support will be made available to the victim-survivor, irrespective of whether they choose to participate in the investigation and/or accountability procedure. Assistance and support should include safety and protection assistance, comprehensive medical assistance, mental health and psychosocial support, legal services and/or basic material assistance, based on existing in-country sexual and gender-based violence referral pathways.
- 5.4 **Strengthen accountability to prevent, mitigate and respond to safeguarding concerns:** MSIAP recognises the importance of proactively promoting the safety and wellbeing and mitigating and responding to any safeguarding risks and/or concerns across its operations. MSIAP has systems in place to monitor safeguarding risks, including sexual exploitation, abuse and harassment, as well as ensures all MSIAP people and anyone with a contractual link to MSIAP, are committed to and uphold their duties and responsibilities to safeguarding and PSEAH. This includes ensuring that staffs, clients and community members, including children, are made aware of their rights and how to report any suspected, alleged or known incidents of sexual exploitation, abuse or harassment through confidential reporting mechanisms.
- 5.5 **Embed safeguarding into organisational culture and demonstrate leadership:** MSIAP is obliged to create and maintain an environment that prevents any form of

sexual exploitation, abuse or harassment and promotes the implementation of this Adult Safeguarding and PSEAH Policy. MSIAP promotes a safe and supportive organisational culture at all levels, which prioritises safeguarding and speaking up to support and develop systems, which maintain this environment.

6.0 Implementation

- 6.1 The implementation of MSIAP's Adult Safeguarding and Protection from Sexual Exploitation, Abuse and Harassment Policy is based on **MSIAP's 6 Core Standards of Safeguarding**. These core standards set benchmarks of good practice and accountability, in areas of operations which have the potential to impact on the safety and wellbeing of adults.
- 6.3 MSIAP will ensure compliance with its policy and procedures amongst its staff and implementing partners who receive funds and/or any kind of support from MSIAP, including all MSIAP People, country programs, external downstream partners, social franchisees funded by or engaged with MSIAP supported projects or activities, and provide the necessary technical support and guidance to ensure they are able to meet the required standards.
- 6.3 The implementation of this Policy is documented and monitored at the project level, and MSIAP funded projects are required to report progress and compliance on a regular basis to MSIAP.

7.0 Core standards

Core Standard 1: Code of Conduct

- 7.1.1 The Code of Conduct provides guidance on the organisational values and standards MSIAP People are expected to adhere to as representatives of MSIAP, both in the workplace and outside of the workplace. This includes the professional boundaries and behaviours expected of them when interacting with others. All MSIAP People sign a declaration of their commitment to adhere to the standards outlined within the Code of Conduct:
- 7.1.2 Describes a list of expected behaviours in relation to adults, detailing what is appropriate and inappropriate conduct, prescribing professional boundaries and defining acceptable and unacceptable relationships, in order to guarantee the safety and wellbeing of adults in vulnerable situations, at all times.
- 7.1.3 Applies to all MSIAP People (who are required to read and sign it upon recruitment)
- 7.1.4 Applies to all MSIAP Country Programs, external downstream partners, social franchisees engaged in MSIAP funded projects or activity implementation (who are required to read and sign it upon contractual engagement).
- 7.1.5 Applies to all MSIAP suppliers and contractors, including consultants (who are required to read and sign it upon contractual engagement).
- 7.1.6 Provides for disciplinary measures in the case of breach, which may include dismissal of MSIAP People, termination of agreements with social franchisees or implementing partners, and reporting to local authorities.
- 7.1.7 It is important that all MSIAP People and anyone with a contractual link to MSIAP,

clearly understand what is expected of them in terms of behaviour and professional boundaries, as outlined in the code of conduct, with clients or affected communities, with whom they come into contact. A list of Adult Safeguarding Standards and Expectations can be found in [Annex 1](#).

- 7.1.8 All clients and affected communities, including children, must understand what is expected of MSIAP People, as well as anyone with a contractual link to MSIAP. This
- 7.1.9 includes MSIAP People and anyone with a contractual link to MSIAP, being aware of the expected code of conduct, how to report breaches and cases of misconduct, in the case that they occur.

Core Standard 2: Safe Recruitment and Screening

- 7.2.1 MSIAP is committed to recruiting safe people, whom we can trust to uphold our commitments to safeguarding and client-centred care, ensuring adults in vulnerable situations, are not put at risk by our staff. For this reason, MSIAP employs a range of safe recruitment practices. These procedures not only aim to identify high-risk individuals, including those unlikely to treat children with dignity and respect, but to make our adult and PSEAH safeguarding commitments clear to candidates, deterring unsuitable individuals from applying.
- 7.2.2 The adult PSEAH safeguarding recruitment procedures effective at MSIAP include:
- a) **Job advertisements and job descriptions:** include a statement of commitment to safeguarding, informing perspective candidates about the values and behaviours they will be expected to uphold
 - b) **Background checks:** The following checks are carried out for all successful candidates as a condition of their employment with MSIAP:
 - Candidates' identity, right to work and qualifications are verified to confirm that they are who they say they are, and they have the required qualifications.
 - Criminal record (police) checks (where available in-country) covering all countries of citizenship and each country where they have lived for 12 months or more in the past five years.
 - Working with children checks to exclude individuals who pose a risk to children or individuals in vulnerable situations.
 - Database vetting checks that screens on anti-money laundering, politically exposed people, international crimes (drug trafficking and modern slavery, if listed) and sanction lists.
 - c) **Reference checks:** Verbal or written reference checks are obtained from at least two of the candidate's most recent employers as a condition for employment. This includes asking a specific question to draw out the candidate's attitude and values towards working with adults and/or children in vulnerable situations and exploring the candidate's suitability to work with these populations.

Interviews: Recruiters ask value-based interview questions, designed to assess whether candidates' values and behaviours align with that of MSI's, their attitudes and values towards safeguarding adults and children including their understanding and commitment to safeguarding, as well as identify and rule out candidates unsuitable for working with children and adults in vulnerable situations.

- d) **Employment contracts:** All employment contracts make explicit reference to disciplinary measures such as dismissal, suspension with or without pay pending outcomes of an investigation, and suspension or transfer to other duties for any employee who is under investigation for breaching the Code of Conduct and/or MSIAP Policies including the Child Safeguarding Policy and Adult and PSEAH Safeguarding Policy.
- e) **Compliance declaration:** All candidates complete and sign a compliance Declaration, declaring any past misconduct and confirming their commitments to adhering to the standards and behaviours outlined within MSIAP's Code of Conduct and/or MSIAP Policies.

7.2.3 Successful candidates must pass through all MSIAP's safe recruitment procedures and demonstrate a commitment to safeguarding. Recruitment documentation is securely maintained within the employees file throughout their employment with the organisation.

Core Standard 3: Training and Awareness activities

7.3.1 All MSIAP People, including anyone with a contractual link to MSIAP, has a role to play in the safeguarding of children. MSIAP is committed to ensure that its personnel understand adult safeguarding/ PSEAH including the ethical standards of conduct that are expected of them, are aware of the PSEAH safeguarding systems of the organisation, as well as understand key SEAH issues and risks across their operations and the projects they support in the region, including how to mitigate them. MSIAP also ensure that personnel understand and are informed of their duty to report all known or suspected adult safeguarding/SEAH concerns, as well as how and where to report these issues in a prompt manner.

7.3.2 All MSIAP People, including MSI Country Program persons funded by or engaged in MSIAP projects must undertake the following trainings to fulfil their roles effectively:

Safeguarding induction training – This online self-paced e-learning safeguarding training upon onboarding, as well as undertake a mandatory safeguarding induction session with the Safeguarding Lead within two months of beginning their employment.

Safeguarding refresher training– Annual refresher training must be completed every 12 months to ensure they maintain knowledge and awareness of MSIAP's Adult and PSEAH and Child Safeguarding policies and procedures.

Safeguarding induction training – all MSIAP People must undertake an online self-paced e-learning safeguarding training upon onboarding, as well as undertake a mandatory safeguarding induction session with the Safeguarding Lead within two months of beginning their employment.

Safeguarding refresher training– all MSIAP People must undertake an annual refresher training every 12 months to ensure they maintain knowledge and awareness of MSIAP's Adult and PSEAH and Child Safeguarding policies and procedures.

Safeguarding management training– all newly appointed Country Directors and senior managers across MSIAP Country Programs must undertake safeguarding management training, facilitated by the Global Safeguarding Lead. The training takes place on a quarterly basis and reinforces understanding of expected conduct, roles and responsibilities, reporting requirements, as well as their overall

accountability and oversight on the issue.

- 7.3.3 MSIAP keeps a record of attendance of all its personnel regarding safeguarding induction and refresher trainings that take place. In addition to trainings, MSIAP takes measures to ensure that all MSIAP People and MSI Country Program persons funded by or engaged in MSIAP projects, are aware of all their PSEAH and Child

Safeguarding related obligations, as well as what actions to take in case of an allegation. Speak Up posters are displayed across MSIAP and MSI Country Program offices and key messages on safeguarding are integrated into quarterly all staff meetings, as well as is a standing agenda on board meetings.

Core Standard 4: Safeguarding Risk Management Processes

- 7.4.1 MSIAP is committed to identifying the areas within our operations where there are potential increased risks for anyone to be harmed by our operations, including through project design or by actions committed by MSIAP People and/or anyone with a contractual link to MSIAP.
- 7.4.2 MSIAP adopts a systematic and structured safeguarding risk management system for all day-to-day operations and across MSIAP funded projects, through:
- **Safeguarding Risk Register:** A Safeguarding Risk Register is developed at the organisational level for MSIAP, reflecting key safeguarding risks faced across the organisation, including child safeguarding risks. The risks are evaluated according to their likelihood and severity, mitigations identified, and risk managers assigned to monitor the risks and ensure mitigations are implemented effectively. Safeguarding risks are also assessed and monitored at the project level for all MSIAP Projects.
 - **Safeguarding Audit:** A Safeguarding Audit on MSIAP Adult and Child Safeguarding systems is developed at the organisational level for MSIAP and Country Programs with MSIAP supported projects. The Safeguarding Audit is reviewed every 3 years to update any key changes in relevant MSIAP policies or practices, compliance requirements and/or contextual organisational shifts.
 - **External Partner Due Diligence:** MSIAP conducts due diligence assessments on external partners and suppliers (i.e., non-profit or commercial entity receiving funds from MSIAP, contractors), prior to entering a formal agreement in order to identify and mitigate risks associated with the partner. Within this assessment the partner's safeguarding policies, processes and procedures are evaluated and contractual requirements outlined to reduce the likelihood that children or adults in vulnerable situations, are harmed by the External Partner.
 - **Safe Programming:** MSIAP provides technical guidance and support to Country Programs with MSIAP supported projects, to ensure that project activities are designed in a way that promotes the safety and welfare of children and adults in vulnerable situations and protects them from exposure to unnecessary risks of harm, exploitation and/or abuse.
- 7.4.3 Safeguarding is integrated as a standing agenda item in all MSIAP Board meetings, Board Finance Risk and Audit Committee meetings, as well as during quarterly review meetings with Country Programs with MSIAP supported projects. All significant safeguarding risks and reported safeguarding allegations are reported to the Board on a quarterly basis for joint monitoring and risk mitigation.

Core Standard 5: Responding to SEAH Allegations

- 7.5.1 MSIAP has set up safe, confidential and accessible reporting mechanisms and procedures for MSIAP personnel, clients and communities, including children, to report child protection and/or SEAH concerns. The description of available reporting mechanisms and procedures are outlined in the MSIAP Child Safeguarding and SEAH Reporting Procedure document.
- 7.5.2 All MSIAP People and anyone with a contractual link to MSIAP, have immediate mandatory reporting obligations of any suspected, alleged or known cases of sexual exploitation and abuse by any MSIAP Person and/or anyone with a contractual link to MSIAP. Suspected, alleged or known cases of sexual harassment allegations should be reported, where safe to do so, whilst ensuring a victim-survivor centered approach. All reported allegations must be immediately (within 24 hours) logged onto the Global Safeguarding Incident Register. This enables relevant MSIAP and MSI Country Program staffs to act quickly to protect adults and children from potentially ongoing risks of harm. Failure to report safeguarding incidences may result in disciplinary consequences.
- 7.5.3 All reports are confidential and can be made anonymously. However, reported persons are strongly encouraged to identify themselves where safe to do so, as this may otherwise limit impact on organisation's ability to investigate.
- 7.5.4 **Investigation:** At all times during the investigation process, MSIAP is committed to:
- Ensuring that the safety, wellbeing, dignity and best interests of the victim-survivor remain the overriding concerns.
 - Treating every reported allegation of sexual exploitation, abuse and/or harassment seriously, ensuring that all parties are treated fairly and procedures are transparent and in line with local law.
 - Dealing with SEAH safeguarding reports in a confidential and timely manner, whilst maintaining confidentiality of the alleged victim-survivors, complainants and the alleged perpetrator/s. Information shall not be disclosed beyond those who have a strict '*need to know*'.
- 7.5.5 **Victim-survivor assistance:** MSIAP is committed to providing assistance and support to victim-survivors of SEAH allegations, as soon as information about the allegation is received, irrespective of their cooperation with an investigation or any other accountability procedure. MSIAP and MSI Country Program staffs, do this through facilitating access to specialized sexual and gender-based violence (SGBV) services and assistance such as safety and protection, comprehensive medical assistance, mental health and psychosocial support, legal services and/or basic material assistance, often based on existing referral pathways established at the country level, with the informed consent of the victim-survivor.
- 7.5.6 **Protection Against Retaliation:** Anyone who reports SEAH safeguarding

allegations in good faith and cooperates with a duly authorised investigation, is protected against retaliation. MSIAP does not tolerate retaliation in any form - harassment, victimisation, or other form of reprisal including informal pressure against anyone who raise concerns and will take appropriate action to protect such MSI People. Any will be treated as a serious disciplinary offence and may result in dismissal.

7.5.7 Disciplinary Action: Sexual exploitation, abuse and harassment are serious

offences. Where cases are substantiated, MSIAP and/or the MSI Country Programme will apply appropriate sanctions, which may include:

- Dismissal
- Non-renewal of contract (for partners, locums, or fixed term employees)
- Termination of agreements (for partners)
- Warning
- Increased supervision
- Re-assignment of duties or location
- Training or re-training

7.5.8 Where a potential criminal offence or serious duty of care violation has occurred the Decision Committee will review whether the case should be reported to the relevant authorities and/or licensing bodies, taking into account legal advice and the best interests of the Victim-survivor.

8.0 Policy monitoring and review

This Policy is effective as of the date of issuance. It will be reviewed and updated to reflect any key changes in relevant MSIAP policies or practices, compliance requirements, contextual organisational shifts, no later than 30 June 2029.

9.0 Key Roles and Responsibilities

MSIAP Board

- Holds overall accountability for ensuring MSIAP's adult/ PSEAH and child safeguarding system is effective in preventing, identifying, managing and responding to safeguarding risks and incidents.
- Receives regular reporting on safeguarding risks, incidents, compliance and organisational trends.

Chief Executive Officer

- Ensures implementation and compliance with MSIAP's Adult Safeguarding and PSEAH Policy, procedures and Code of Conduct across the organisation.
- Oversees the management and escalation of safeguarding allegations, in accordance with organisational and donor requirements, in coordination with the MSIAP Safeguarding Lead.
- Engages in the Safeguarding Decision Committee, in coordination with key stakeholders

for safeguarding allegations associated with MSIAP and/or MSIAP supported projects.

- Monitors organisational safeguarding risks and reports significant risks and trends to the Board.

MSIAP Safeguarding Lead

- Provides strategic leadership and technical oversight for safeguarding across MSIAP and MSIAP-supported projects, ensuring compliance with organisational standards and donor requirements.
- Oversees safeguarding risk management, including monitoring organisational and project-level risks, supporting mitigation measures, and escalating significant risks to senior leadership and the Board, as appropriate.
- Coordinates the management of safeguarding concerns and allegations, ensuring timely, confidential and victim-survivor centred and trauma-informed responses in accordance with organisational procedures.
- Strengthens safeguarding capacity across MSIAP and Country Programmes with MSIAP supported projects through providing guidance and technical support.
- Monitors safeguarding performance and compliance, and prepares organisational safeguarding reports, trend analyses and assurance updates for senior leadership and the Board.

Project Team

- Ensures safeguarding considerations, risks, mitigation measures and resource requirements are integrated into the design, development, implementation and management of all MSIAP-supported projects.
- Ensures safeguarding obligations arising from MSIAP policies, donor requirements and organisational standards are clearly reflected in funding agreements, project documentation and partner arrangements, and communicated to Country Programmes and downstream partners across MSIAP-supported projects.
- Ensure safeguarding risk management and compliance are discussed and documented during project inception processes, quarterly project monitoring and review processes, and that emerging risks, concerns and non-compliance issues are promptly escalated to the MSIAP Safeguarding Lead.
- Work closely with Country Programmes across MSIAP-supported projects and the MSIAP Safeguarding Lead to strengthen safeguarding capacity, address compliance requirements and support continuous improvement in safeguarding practice.

Corporate Services Team

- Ensure the implementation of adult and PSEAH safeguarding processes through completion of MSIAP Due Diligence for all downstream partners, including contractors and associated personnel.

Human Resources Focal Point

- Support the implementation of safe recruitment, screening and onboarding processes in accordance with MSIAP safeguarding requirements.
- Ensure all MSIAP People complete required safeguarding recruitment checks, sign the

Organisational Code of Conduct, and are informed of their safeguarding responsibilities upon commencement.

- Support managers to undertake appropriate due diligence, including reference checks, police checks and other safeguarding-related screening requirements, where applicable.
- Provide advice and support on safeguarding-related employment matters, including the management of misconduct, disciplinary actions and breaches of the Safeguarding Policy and/or Code of Conduct.

All MSIAP People

- Responsible for adherence to and implementation of Adult Safeguarding and PSEAH Policy, Code of Conduct and related procedures, in their area of responsibility.
- Promote a culture of safeguarding and respect in all interactions.
- Promptly report all safeguarding concerns, allegations or incidents through established reporting mechanisms.
- Conducts safeguarding spot checks during in-country missions and ensures that any key safeguarding risks and/or concerns are escalated to MSIAP Safeguarding Lead appropriately.

ANNEX 1

Adult Safeguarding Standards and Expectations

The following standards of conduct have been outlined in order to ensure adults in vulnerable situations, MSIAP People and people engaged in MSIAP funded projects are safeguarded from all forms of harm.

1. **At all times (whilst carrying out professional activities or whilst acting in a personal capacity outside work) MSIAP People and anyone with a contractual link to MSIAP are expected to:**
 - **Be sensitive to the power imbalances** that may exist between themselves and clients, community members, colleagues, or partners; and not seek to misuse the power they hold.
 - **Recognise that everyone has the potential to experience vulnerability** and therefore treat everyone equally with dignity and respect regardless of their age, disability, socio-economic status, religion, race, caste, indigeneity, ethnic group, sex, gender identity, sexual orientation, or any other characteristic.
 - **Not engage in any behaviour which may be considered** sexual exploitation, harassment or abuse, discrimination, victimisation, or violence against any client, community member, colleague, or partner, at any time.
 - **Maintain professional boundaries with clients** at all times, including refraining from contacting clients outside of the approved client-follow up channels.
 - **Refrain from providing services to clients they have a relationship with** unless declared as a conflict of interest and approved by the County Programme.
 - **Provide respectful, client-centred**, and non-judgemental services, using non-technical language. Take care to ensure that vulnerable clients feel heard and supported to make autonomous decisions about their healthcare. Adapt communication approaches where necessary.
 - **Ensure a chaperone** (i.e., a second staff member or government health worker) is present or offered to clients of the opposite gender throughout all intimate examinations and procedures.
 - **Clearly explain to clients what a service involves, using non-technical language.** Seek active and continuous consent and do not touch clients without permission. Be prepared to stop if a client is uncomfortable.
 - **Maintain client privacy and dignity** e.g., offer use of a paper drape and private changing areas.
 - **Follow [MSI's Data Privacy Standards](#)** in order to ensure sensitive and personal (i.e., client-level data, employee records, or information relating to safeguarding cases) is not misused and/or does not expose individuals to risks of harm.
 - **Act in accordance with [MSI's SGBV guidelines](#)** where someone discloses or indicates that they may be a victim of sexual or gender-based violence.
 - **Report any suspicion, allegation or witness** of exploitation, abuse, or harassment of a vulnerable adult or other breach of MSI's Safeguarding Policies and Code of

Conduct by MSI People or Partners via MSI's Speak Channels outlined in Section 5.2.1

- **Actively promote and seek client and team member feedback** in order to identify and mitigate safeguarding risks.
- **Promote a caring and inclusive culture at MSI** which safeguards children and vulnerable adults and speaks up about concerns.

2. Whilst photographing, or recording adults at work MSI People

- Adhere to the guidelines outlined with [MSI's Ethical Story Gathering Toolkit](#).
- Assess and endeavour to comply with local traditions or restrictions for reproducing personal images.
- Obtain informed consent from adults before recording, ensuring that they fully understand how the images will be used and possible repercussions. Ensure that all images can be removed or deleted should informed consent be withdrawn at any time.
- Ensure that images and associated information are honest representations of the context and facts and are strictly relevant to the work of MSI.
- Ensure media imagery and stories present all adults, children and young adults in a dignified and respectful manner and not in a vulnerable or submissive manner. Individuals should be adequately clothed and not in poses that could be seen as sexually suggestive.
- Ensure file labels, meta data or text descriptions do not reveal identifying information about a person when sending images electronically or publishing images in any form.