



# SAFEGUARDING POLICY

## Introduction

Diode Consultancy (also referred to as “the organization”) is a global consultative practice dedicated to strengthening access to fundamental human rights. Our practice focuses on four key areas - social research, supporting program implementation, advocacy, and providing advisory services. More specifically Diode Consultancy works within these portfolios:

**Social Research:** We conduct and coordinate evidence-based research that primarily focuses on strengthening access to fundamental human rights for underrepresented communities and excluded populations. Utilizing mixed-methods and participatory approaches, each research project is grounded in ethical principles, robust methodologies, credible data collection and continued stakeholder engagement. With over a decade of research experience, our goal is to generate evidence through research that translates to understanding and addressing inequalities in access to fundamental human rights.

**Program Implementation:** We provide technical support for community and civil society led program implementation through a program needs assessment, policy and process development, strategic planning discussions, subject matter capacity development, and monitoring and evaluation support. Our combined subject matter experience include programs related to people affected by displacement and migration, people affected by HIV, people in restricted context, ethics, child protection, sexual and gender-based violence, sexual reproductive health, public health, mental health, disaster medicine and humanitarian response. We work collaboratively with partners to ensure programs are not only effectively implemented but also responsive to the needs of the communities they serve.

**Advocacy:** We develop advocacy materials tailored to diverse audiences: from communities and the general public to government, academic, and policy spaces. Drawing on nearly two decades of work with refugees, migrants, children, people affected by HIV, people in restricted contexts and other marginalised groups, we triangulate existing data and evidence to craft clear, impactful messages. Our goal is to turn complex realities into accessible narratives that inform, persuade, and drive change.

**Advisory services:** We provide grounded, practical advice to civil society organizations, students, and consultants working with marginalized populations, particularly in community centered approaches. With extensive experience in clinical, academic, community engagement and case management roles, we help others design ethical, inclusive, and effective approaches.

## Purpose and Scope

The purpose of this safeguarding policy is to protect people, particularly high-risk groups like children, marginalized adults and beneficiaries of assistance, from any harm that may be caused due to their coming into contact with the organization. This includes harm arising from:

- The conduct of consultants or any other individuals associated with the organization,
- The design and implementation of the organization’s programs and activities,
- Any communications or materials produced by the organization.



The policy lays out the commitments made by the organization and informs consultants and associated individuals of their responsibilities in relation to safeguarding.

This policy does not cover violence in the community that is not perpetrated by the organization or associated individuals.

For the purposes of this policy and all related documents, 'consultants and associated individuals' refer to paid and unpaid consultants, interns, volunteers, and anyone contracted to represent Diode Consultancy or its work.

## The Safeguarding Environment

Diode Consultancy recognises that working with marginalised people creates an uneven power dynamic between:

- Those providing services and those receiving it,
- Consultants who are paid or senior in the organisation and volunteers or research assistants,
- Those with more power against members of particularly high-risk groups, including individuals who are children, women, racial/ethnic minorities, differently abled persons, survivors of , and LGBTQI+ persons

Where there are large differences in power and privilege, the risk of safeguarding misconduct increases. Such harm can include sexual exploitation and abuse (SEA); harassment and bullying; physical, verbal, emotional, and mental abuse and violence; exploitation; discrimination; and/or denial of services. This abuse of power might occur in program delivery, research implementation, and by contracting marginalized individuals from the community to work in partnership with the organization.

The organization is aware that safeguarding risks are heightened during humanitarian responses due to several reasons - perpetrators can often act with impunity and pre-existing differences in power are made deeper by the crisis creating more opportunities for abusive behaviours.

The organization understands that there are specific safeguarding risks working with underrepresented communities and excluded populations particularly when communities are not able to access national protection services. In particular, the organization considers the following communities to present especially high safeguarding risk:

- people affected by displacement and migration
- undocumented persons,
- people affected by HIV,
- people in restricted context,
- children,
- survivors of sexual and gender-based violence and other forms of violence and torture,
- differently abled individuals,
- individuals identifying with the LGBTIQ+ communities, and
- individuals with mental health concerns



## Policy statement

Diode Consultancy takes a zero-tolerance approach to abuse and exploitation of individuals with a high safeguarding risk. This includes any forms of abuse whether physical, emotional, sexual or neglect. Under no circumstances will any abuse by consultants and partners be tolerated. The organization is committed to protecting the rights, safety and well-being of all individuals with a high safeguarding risk. This policy is enforced through the guidelines below, and reporting mechanisms to ensure that incidents of abuse are addressed promptly and effectively while fostering a safe and supportive environment for persons with high safeguarding risk.

## Guiding framework

The policy is particularly guided by the following principles:

### **Non-Discrimination/Universality**

The organization believes that all persons with high safeguarding risk have equal rights to protection from all forms of abuse, neglect and exploitation, regardless of their gender, age, race, nationality status, ability, religious or political beliefs, family background, economic status, legal status, physical or mental health. Any forms of discrimination by persons associated with the organization will not be tolerated.

### **Duty of Care and to do no harm**

Diode takes seriously its duty of care towards persons with high safeguarding risk and communities it works with and is committed in ensuring all partners and external contractors clearly understand the behaviours that are expected when working with persons with high safeguarding risk. In all actions, the organization is guided by the principle of doing no harm and will make every effort to minimise and mitigate the risk of harm.

### **Best Interests principles**

Based on the child rights principle taken from Article 3 of the UN Convention on the Rights of the Child (UNCRC), the organization upholds best interest as a primary consideration in all actions and decisions concerning children. This principle not only influences the organization's work but is of particular consideration when managing disclosures and reports of child protection concerns.

### **Right to participation, inclusion in decision making and respecting autonomy**

The organization believes that an individual has the right to make his/her own choice and that it is important to respect the right to self-determination. To be able to do this, the organization ensures that sufficient information is provided so individuals are able to understand, participate in design and decision making, and agree to such participation in programs or research without coercion or influence. This principle also protects people who are not able to act in an autonomous manner – for example persons who are mentally unsound. When people are not able to make true informed decisions on their own, further steps need to be taken to minimize harm.

### **Community-centred**



The organization is guided by the principle that places the needs, strengths, and well-being of a community at the heart of decision-making by ensuring that activities are inclusive, relevant, and effectively reflect the community's experiences. By being community-centred, the organization recognizes that effective safeguarding must be informed by the lived experiences, strengths, and cultural contexts of each community.

### **Upholding justice**

The organization believes that upholding justice as a guiding principle of this safeguarding policy ensures that persons with high safeguarding risk are treated with fairness and respect. This is done by ensuring that concerns, allegations, or actual breaches of this policy are handled transparently and impartially, with accountability for those responsible for misconduct. This principle also enables the organization to build trust and create safe spaces where persons with high safeguarding risk can feel protected and valued.

## **Overarching Safeguarding Principles**

- The organization is committed to upholding global safeguarding standards and to working with others to keep people safe.
- The organization understands that Safeguarding is about ethical and practical approaches that promote the safety and wellbeing of everyone involved in the delivery and receipt of services.
- The organization notes that the consultative practice is underpinned by a commitment to uphold universal human rights and defend human dignity. The organization recognises then that it has a duty of care towards recipients and those working with the organisation.
- The organization commits to taking all reasonable steps towards protecting anyone who comes into contact with the organisation, its operations or programmes from harm, particularly those with high safeguarding risk.
- The organization understands a child to be any person under 18 years of age. Ignorance about a child's age will not be accepted as an excuse for any sexual activity.
- The organization reaffirms that inaction is unacceptable where safeguarding is concerned.
- The organization commits to taking a survivor-centred approach to safeguarding, meaning that the survivor's needs and wishes are respected and prioritised above all else.
- Based on a survivor-centred approach that promotes survivors' choice and control, it means that informed consent will be sought before taking any action that relates to the survivor or their experience. This means that the organization will provide a complete picture of information to the survivor so that they can make an informed decision. Consent will only be overridden if the survivor is unable to make sound decisions for themselves (or any children in their care) due to cognitive or intellectual concerns, is under 18 years of age and therefore a child, or where they or others would be placed in immediate and/or life-threatening danger if a report to authorities is not made. In all cases, including with children, survivors will be consulted and updated throughout reporting and response.
- To support the participation of children, child friendly language will be used, and information will be given in a way that fits their developmental maturity.



- Care will be taken to ensure that survivors are not retraumatized by their engagement with the organization.

## Implementing the Safeguarding Policy

### Safeguarding Focal Point (SFP)

The Diode Safeguarding Focal Point (SFP) main responsibility will be to receive reports of any safeguarding, child protection or Code of Conduct breaches. Consultants and persons associated with the organization should report any concerns related to persons with high safeguarding risk to the SFP. The SFP will be tasked with managing disclosures, reporting and interventions accordingly.

The Primary SFP will be Dr. Veena Pillai, [veena@diodeconsultancy.org](mailto:veena@diodeconsultancy.org). In her absence, the secondary SFP will be Ms. Jennifer Clement, [jennifer@diodeconsultancy.org](mailto:jennifer@diodeconsultancy.org)

### Code of Conduct

Diode Consultancy believes marginalized populations are often at risk of being denied equal rights to protection from violence, abuse, exploitation, and neglect. In implementing the organization's work, consultants and other persons associated with the organization will come into contact with clients, participants and communities that are marginalized. The organization takes seriously its duty of care towards marginalized persons and communities it works with and is committed in ensuring all partners and external contractors clearly understand the behaviours that are expected when working with persons with high safeguarding risk. A Code of Conduct describing acceptable and non-acceptable behaviours is available in the Appendix. All consultants, volunteers, external contractors, interns and any other persons associated with Diode are required to agree and abide by the above mentioned Code of Conduct.

### Managing Disclosures and Intervening on Child Protection concerns

The organization is committed to safeguarding all children from abuse, exploitation, and neglect. Child protection involves safeguarding children from abuse, exploitation, and neglect while ensuring physical and emotional well-being. Recognising signs of concern—such as changes in behaviour, unexplained injuries, or withdrawal—is integral to proactive safeguarding.

Child abuse refers to any action, behaviour, or lack of action that harms a child's well-being, health, or development. It can occur in various forms and can be perpetrated by anyone. Abuse can take place in the home, school, or community setting and can leave both physical and emotional scars on the child.

*Indicators of Abuse* - Representatives of Diode Consultancy must be aware of some of the indicators of abuse and neglect, so that concerns can be raised. These signs and indicators should never be ignored, but equally they do not always mean a child has been abused, as other explanations are possible.

*Disclosure of Abuse* – The organization is committed to acting upon and investigating disclosures (i.e. when a specific allegation of abuse is made against a named individual) and suspicions (i.e.



when concern is expressed or observed that abuse may have taken place) swiftly. At all times, the welfare and best interest of the child is of paramount consideration.

*Managing Disclosure from a Child* – When a child discloses abuse, consultants and people associated with the organization will:

- Listen to the child and accept what is being said. Allow the child to speak freely, asking open questions only to establish the basic facts or nature of the complaint.
- Reassure the child that they have done the right thing by disclosing. Take the allegation seriously.
- Avoid promising the child total confidentiality as it is a child protection matter and the child may still be at risk.
- Explain your responsibility to pass the information to the SFP of Diode, and a child protection officer either affiliated with the Department of Social Welfare or a child protection agency.

When managing disclosures, the organization expects parties involved to avoid gossip and making assumptions, and avoid investigating, informing or confronting the alleged perpetrator(s).

*Upholding confidentiality* – All parties involved must ensure that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management will be shared on a need-to-know basis only and must be kept secure at all times in password protected folders and sharing systems.

*Reporting Mechanisms* – There are two types of child protection reports that may be made to the SFP of the organization:

- Reports concerning a consultant or person contracted by Diode Consultancy
- Reports concerning a partner currently working with Diode Consultancy

To make a report please contact the SFP noted above via email. The SFP courses of action may differ based on the complaint received.

## Safe recruitment and training

The organization will ensure all potential new consultants and partners are screened in line with safe recruitment guidelines. While the organization understands that proper screening may not always be possible, where possible, two references will be required. All consultants and partners associated with the organization will be trained and expected to adhere to this safeguarding policy and other relevant associated policies.

## Safe Program Design

The organization will take every step to design programmes in a way which considers the potential risks to persons with high safeguarding risk, and work towards minimising those risks. Risks can be intended or unintended, from consultants or others associated with the organisation, or incidental as a result of the program or research undertaken. Efforts will be taken where possible to ensure program design is done in consultation with affected communities to understand and minimize risk.



## Communications and use of images

The organization recognises that persons with high safeguarding risk can be put at risk through the sharing or use of their images, videos, or other identifiable information. In order to minimise any risk to such individuals, the organization will ensure that:

- A risk assessment is conducted to ensure there is no harm or threat of harm that will come upon the person with the collection of any image or recording.
- Consent through the relevant consent procedures prescribed under the work is obtained. Consent must be from persons who are able to provide consent, and parents or caregivers of children. Consent will include how and where the image or recording will be stored and used.
- All photographs or films present persons in a dignified and respectful manner.
- Images and recordings are honest representations of the context and the facts and only used for the purposes it was set out to be used for.
- Images and recordings do not reveal identifying information and are stored confidentially.
- No images, recordings or any accompanying information is posted on any personal social media site.

All consultants, volunteers, external contractors, interns and any other persons associated with Diode are required to agree and abide by the above as outlined in the Code of Conduct as well.

## Breach of Safeguarding Policy

Any consultants and persons associated with Diode Consultancy who are suspected of breaching safeguarding standards, the Child Protection Policy, and the Code of Conduct will face immediate consequences. This may include termination or suspension of contracts, possibly including loss of pay; dissolution of partnership agreements and/or service contracts with or without payment; and potentially reporting to the authorities based on National laws if criminal behaviour has or is strongly suspected to have taken place.

## Supporting Policies

This safeguarding policy must be read in line with the following supporting policies and agreements:

- Diode Code of Conduct
- Diode Confidentiality Agreement
- Privacy and Security Policy

All consultants and persons associated with the organization are expected to read, understand and agree to comply with the safeguarding policy and the above mentioned supporting policies.

## Monitoring and Review

This safeguarding policy will be reviewed at least once every four years. If legal, security, or program changes warrant more frequent review, this will be the responsibility of the SFP to initiate accordingly. Implementation will be monitored through field and advocacy work.