## Version 2.0 | November 2026

# ADULT SAFEGUARDING POLICY

SALMA ATTAH FOUNDATION FOR WOMEN AND GIRLS SUPPORT

SAFWGS

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# Adult Safeguarding and PSEA Policy

Version 2.0 | Approved November 2026 | Next review November 2027

## Policy statement

SAFWGS works with women, young women, survivors of violence, community members and partners across Niger, Kaduna and Kano States and the Federal Capital Territory. Every adult who takes part in our work has the right to be safe, to be treated with dignity and to be free from abuse, exploitation and harassment.

SAFWGS has zero tolerance for sexual exploitation, abuse and harassment (SEAH) by anyone working for or representing us. We will act on every concern, put the safety and wishes of the survivor first, and hold perpetrators to account.

This policy covers adults aged 18 and over. Anyone under 18 is protected by the Child Safeguarding Policy.

## Who this policy applies to

- Board members, staff, interns, fellows and volunteers
- Consultants, facilitators, mentors, trainers, drivers and suppliers working on SAFWGS activities
- Partner organisations implementing work with or for SAFWGS
- Visitors, journalists, photographers and donors attending SAFWGS activities

It applies at all times during SAFWGS work, including at events, in communities, while travelling, and online, including WhatsApp groups, social media, SMS and digital tools such as SafeSisi+.

## Key terms

**Adult at risk:** an adult who may be less able to protect themselves from harm because of their circumstances, for example a survivor of violence, a person with a disability, a displaced person, someone in a crisis, or someone who depends on SAFWGS for support, a stipend or services.

**Sexual exploitation:** any actual or attempted abuse of a position of vulnerability, power or trust for sexual purposes, including profiting financially, socially or politically from the sexual exploitation of another.

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

**Sexual harassment:** unwelcome sexual advances, requests for sexual favours, or other verbal, non-verbal or physical conduct of a sexual nature, including online.

**Survivor:** the person who has experienced or is alleged to have experienced harm. SAFWGS uses this term unless the person prefers another.

# Principles

- **Survivor-centred:** the safety, wishes, dignity and confidentiality of the survivor guide every decision
- **Do no harm:** our activities, messages and data practices must not put anyone at greater risk
- **Consent:** adults decide for themselves whether to report, to whom and what support to receive, except where there is a serious risk to life or to a child
- **Non-discrimination:** everyone is protected regardless of age, disability, ethnicity, religion, marital status or any other status
- **Accountability:** concerns are recorded, acted on and reported to the Board and, where required, to funders

# The six core principles on sexual exploitation and abuse

SAFWGS adopts the six core principles of the Inter-Agency Standing Committee (IASC), as adapted for our work:

1. Sexual exploitation and abuse by SAFWGS personnel are acts of gross misconduct and grounds for dismissal or termination of any agreement.
2. Sexual activity with children (anyone under 18) is prohibited, whatever the local age of consent or age of marriage. Mistaken belief about a child's age is not a defence.
3. Exchanging money, employment, goods, services or assistance for sex, including sexual favours or other humiliating, degrading or exploitative behaviour, is prohibited. This includes any support due to programme participants.
4. Any sexual relationship between SAFWGS personnel and a programme participant that involves improper use of rank or position is prohibited.
5. Anyone who has a concern or suspicion about sexual exploitation or abuse by a fellow worker, whether in SAFWGS or not, must report it.
6. All SAFWGS personnel must create and maintain an environment that prevents sexual exploitation and abuse. Managers have particular responsibility for this.

# Code of conduct

Everyone covered by this policy must:

- Treat participants, colleagues and community members with respect, whatever their background
- Never use their position to ask for or accept sex, money, gifts, favours or personal services from participants or their families
- Never ask participants for their personal phone numbers or social media contacts for private reasons, or contact them outside agreed programme channels

- Avoid being alone with a participant in a closed or private space; meet in visible places and, where possible, with a second person present
- Never photograph, film or record anyone without their informed consent, and follow the Communication and Visibility Policy for any images
- Never share a participant's personal story, location or identity without consent
- Not use alcohol or drugs in a way that affects their conduct during SAFWGS activities
- Report any concern under this policy

# Safe recruitment and partners

- Every role advertised by SAFWGS includes a commitment to safeguarding
- Shortlisted candidates for roles with direct contact with participants are asked safeguarding questions at interview
- At least two references are taken, including from the most recent employer, and include a question on safeguarding concerns
- Staff, volunteers, consultants and facilitators sign this policy and the code of conduct before starting
- Partners and suppliers working directly with participants confirm in writing that they will follow this policy or an equivalent one
- SAFWGS will not knowingly engage anyone dismissed or investigated for sexual misconduct, and will share information about misconduct with other organisations where the law and our Data Protection Policy allow

# Safe programming

Before each project, event, training or outreach activity, the activity lead completes a short safeguarding risk check covering venue, transport, overnight stays, supervision, mixed-sex settings, online elements and referral options. Where risks are identified, the lead records how they will be reduced.
Online groups and digital tools must have at least two SAFWGS administrators, clear group rules, and a way for members to report concerns privately. Personal data collected through digital tools is handled under the Data Protection Policy.

# How to report a concern

Report any concern, suspicion or disclosure as soon as possible and within 24 hours. You do not need proof.

- **Email:** info@safwgs.org with the subject line "CONFIDENTIAL – Safeguarding"
- **Phone or WhatsApp:** +234 813 693 1762
- **In person** to the Safeguarding Focal Person or the Executive Director
- **The Board Chair**, if the concern involves the Executive Director or the Safeguarding Focal Person

Programme participants and community members can also raise concerns through facilitators, feedback boxes at events, or by calling or messaging the number above. Reports can be made in English, Hausa or another language the person prefers.
If someone is in immediate danger, contact the police or emergency services first, then inform SAFWGS.

# Responding to a disclosure

If someone tells you they have been harmed:

- Listen calmly and believe them; do not ask leading questions or investigate
- Explain that you will need to share the concern with the Safeguarding Focal Person so they can get support, and ask what they would like to happen
- Do not promise to keep it secret, and do not confront the alleged perpetrator
- Write down what was said, in their words, with the date and time, and pass it on the same day
- Share it with no one else

# What SAFWGS will do

- The Safeguarding Focal Person acknowledges the report within 24 hours and checks whether anyone is at immediate risk
- With the survivor's consent, SAFWGS refers them to medical, psychosocial, legal and shelter services, including Sexual Assault Referral Centres where available
- The Executive Director decides within 5 working days whether an investigation is needed and appoints an independent investigator; anyone accused may be suspended or removed from contact with participants while this happens
- Where a crime may have been committed, SAFWGS supports the survivor to report to the police or other authorities and cooperates fully with them
- Funders are informed within the timeframe in the relevant grant agreement, without identifying the survivor
- The outcome is recorded and the Board receives an anonymised summary at its next meeting

# Confidentiality and records

Safeguarding records are kept in a locked or password-protected location, separate from general files, and only the Safeguarding Focal Person, the Executive Director and investigators may access them. Records are kept for at least six years after the case is closed, and are handled under the Data Protection Policy.

# Training

All staff, volunteers and facilitators receive safeguarding and PSEA training within one month of starting and a refresher every year. Board members receive a briefing each year.

# Roles

- **Board:** has overall responsibility, appoints a Board Safeguarding Lead and reviews safeguarding at each meeting
- **Executive Director:** makes sure this policy is followed and resourced, and handles cases with the Safeguarding Focal Person
- **Safeguarding Focal Person:** receives and records concerns, arranges referrals, keeps the referral directory current and leads training
- **Managers and activity leads:** carry out risk checks and make sure everyone on their activity knows this policy
- **Everyone:** follows the code of conduct and reports concerns

# Safeguarding contacts

Safeguarding Focal Person: contact through info@safwgs.org or +234 813 693 1762
Board Safeguarding Lead: contact through info@safwgs.org (subject “CONFIDENTIAL – for the Board”)
General reporting line: info@safwgs.org (subject "CONFIDENTIAL – Safeguarding") | +234 813 693 1762

# Legal framework

This policy is guided by the Constitution of the Federal Republic of Nigeria, the Violence Against Persons (Prohibition) Act 2015 and the state laws that apply where we work, the Nigeria Data Protection Act 2023, the UN Secretary-General's Bulletin on special measures for protection from sexual exploitation and abuse (ST/SGB/2003/13), and the IASC six core principles.

# Related policies

- Child Safeguarding Policy
- Whistleblowing Policy
- Data Protection Policy
- Communication and Visibility Policy
- HR Policy
- Volunteer Policy

# Approval

Approved by the Board of SAFWGS in November 2026. This policy will be reviewed in November 2027, or earlier if the law, a funder requirement or SAFWGS's work changes. Approved by the Board of Trustees of SAFWGS by resolution dated 12 November 2026. Signed copies are held by SAFWGS and are available to funders and partners on request.

# Personal declaration

I have read and understood the SAFWGS Adult Safeguarding and PSEA Policy and code of conduct. I agree to follow them, and I understand that a breach may lead to disciplinary action, the end of my engagement with SAFWGS and referral to the authorities.

Name: _____ Role: _____

Signature: _____ Date: _____