



Safeguarding Policy



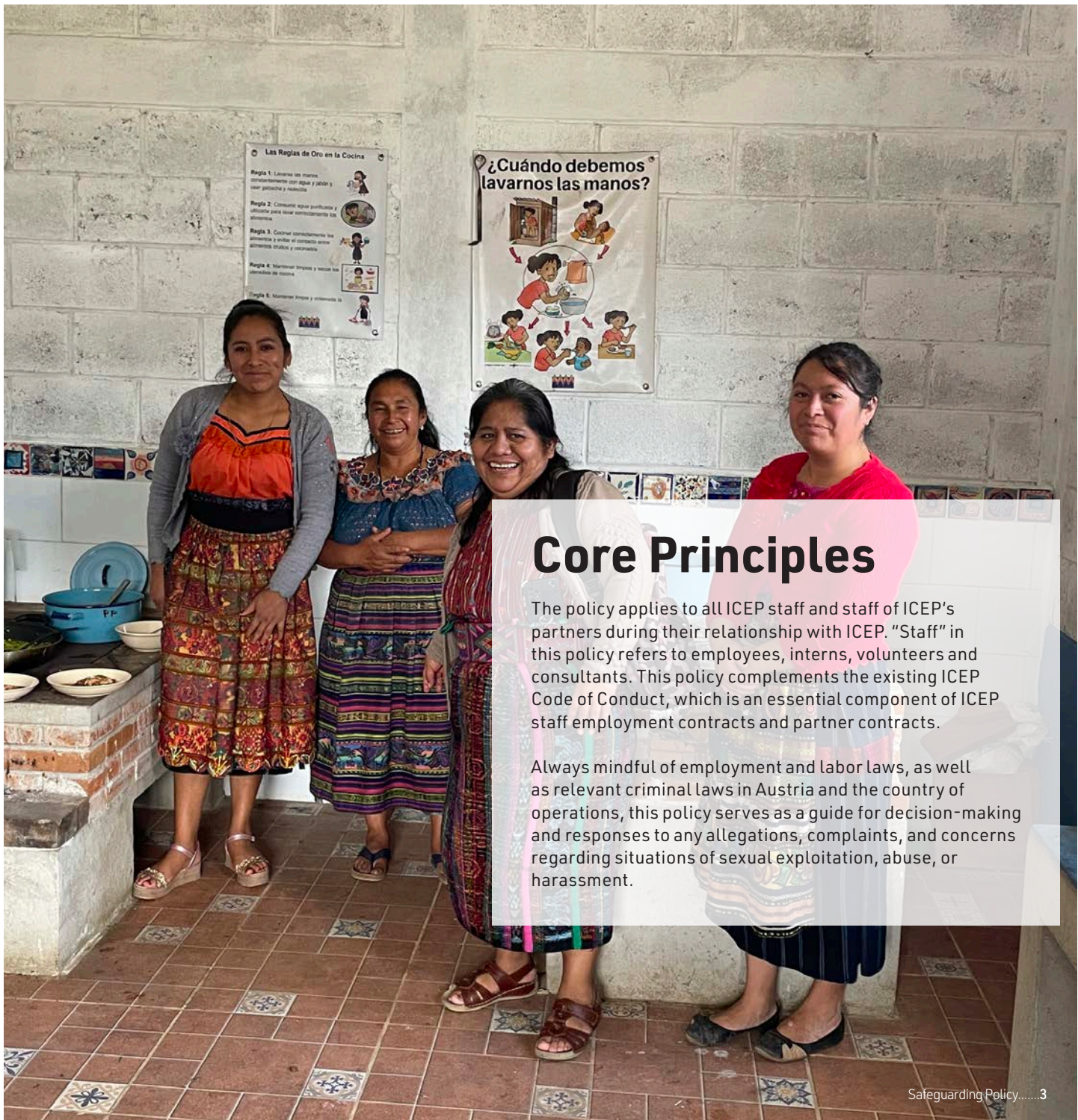
Introduction

The purpose of this policy is to outline ICEP's approach to safeguarding children and adults, particularly from sexual exploitation, abuse, and harassment.

The policy outlines the following:

- The principles upon which ICEP bases its decision in cases where a safeguarding response is required,
- ICEP's expectations of all its staff, including staff of partners,
- ICEP procedures to ensure effective action is taken when sexual exploitation, abuse or harassment cases have occurred.

Safeguarding means protecting the health, welfare and individual rights of all persons and enabling them to live free from violence, abuse, neglect and bullying. ICEP understands this to mean protecting both children and adults from harm resulting from direct or indirect contact with ICEP staff, volunteers, and programs.



Core Principles

The policy applies to all ICEP staff and staff of ICEP's partners during their relationship with ICEP. "Staff" in this policy refers to employees, interns, volunteers and consultants. This policy complements the existing ICEP Code of Conduct, which is an essential component of ICEP staff employment contracts and partner contracts.

Always mindful of employment and labor laws, as well as relevant criminal laws in Austria and the country of operations, this policy serves as a guide for decision-making and responses to any allegations, complaints, and concerns regarding situations of sexual exploitation, abuse, or harassment.

Definitions

Violence

Violation of a person's personal rights that results in psychological, physical, or other physical or emotional harm.

Psychological Violence

Psychological violence encompasses emotional abuse, including but not limited to humiliating or degrading treatment such as name-calling, persistent criticism, belittling, shaming, solitary confinement, and isolation.

Sexual Exploitation

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

Sexual Abuse

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

Bullying

Bullying is unwanted or disproportionate behaviour that demeans, intimidates, or humiliates a person, both as an individual and as part of a group of people. Bullying most often consists of persistent and intimidating acts carried out by people that are perceived to be (by the bully or the bullied) in positions of power, inducing others to act through fear, persecution, or suppression through coercion or force.



Sexual Harassment

Sexual harassment in the workplace is defined as any behaviour by a staff member with a sexual aspect within the workplace environment that is unwanted and humiliating towards another colleague working for ICEP or its partner organisations. This includes any unwelcome advances, requests for favours, and other verbal or physical conduct of a sexual nature, from the perspective of the person being harassed. It can be directed towards one person, groups of people or towards everyone and can occur as a one-off incident or be a pattern of harmful behaviour. The effect of sexual harassment usually leads to violation of the dignity of another person and creates an intimidating, hostile, degrading, humiliating or offensive environment for them. Both men and women may be victims of sexual harassment.

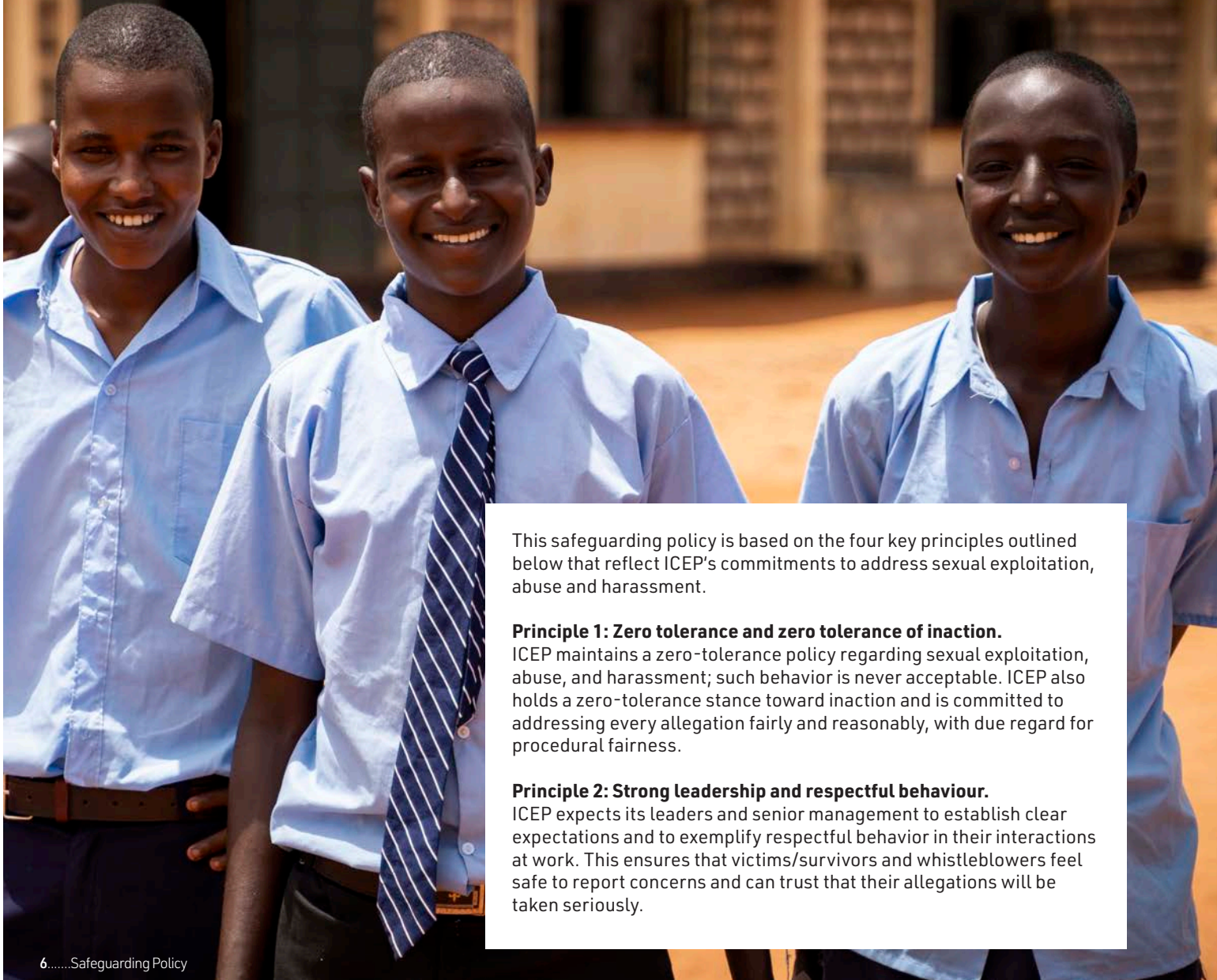
Sexual harassment in the workplace also encompasses harassment at official or casual events, such as annual dinners, staff retreats, etc. If the harassment occurs outside of work, it is still considered workplace-related if it impacts the professional relationship. Sexual harassment can take many forms, including but not limited to the following:

- Intimidating and suggestive remarks about the appearance of staff,
- Sexist comments or jokes about sexual behaviour or the sexual orientation of colleagues,
- Displaying, posting, publishing, or distributing pornographic or sexist material, whether physically or electronically,
- Unwanted invitations with unmistakable intent,
- Unwanted bodily contact,
- Stalking of employees either at work or outside work,
- Attempts to make a pass at another person (including written or electronic messages) accompanied by the promise of certain advantages or threat of certain disadvantages,
- Sexual assault, coercion or rape.

Severe verbal sexual harassment is punishable by law. In the event of such situations, ICEP is concerned with the impact of behaviours on the complainant. An action or behaviour can still be considered sexual harassment even if the alleged harasser did not intend for it to be harmful. Communication and explanation from both sides are important in this context.



Principles on Sexual Exploitation



This safeguarding policy is based on the four key principles outlined below that reflect ICEP's commitments to address sexual exploitation, abuse and harassment.

Principle 1: Zero tolerance and zero tolerance of inaction.

ICEP maintains a zero-tolerance policy regarding sexual exploitation, abuse, and harassment; such behavior is never acceptable. ICEP also holds a zero-tolerance stance toward inaction and is committed to addressing every allegation fairly and reasonably, with due regard for procedural fairness.

Principle 2: Strong leadership and respectful behaviour.

ICEP expects its leaders and senior management to establish clear expectations and to exemplify respectful behavior in their interactions at work. This ensures that victims/survivors and whistleblowers feel safe to report concerns and can trust that their allegations will be taken seriously.

Abuse and Harassment

Principle 3: Victim/survivor needs are key.

Before taking any actions with an impact on the well-being or integrity of the victim/survivor, their approval must be sought. ICEP will ensure that any actions to address sexual exploitation, abuse and harassment are based on a do-no-harm approach. This approach prioritizes the rights, needs, and wishes of the victim/survivor while maintaining procedural fairness for all parties. Victims/survivors will be treated with dignity and respect, involved in decision-making, and provided with comprehensive information. Their privacy will be protected, and the matter will be dealt with confidentially. There will be no discrimination in proceedings based on gender, age, race/ethnicity, ability, sexual orientation, or other characteristics. If requested, counseling and health services will be provided to assist the victim/survivor with their recovery.

Principle 4: Prevention is a shared responsibility.

Preventing sexual exploitation, abuse and harassment is everyone's responsibility. An effective change in reducing these issues will happen only when every sector every sector, including government, business, non-government organizations, communities, and individuals, plays a role.. ICEP therefore requires the commitment, support and investment of its partners to enforce this policy. All partners have a responsibility to build their capacity and prepare their staff to deal sensitively and effectively with sexual exploitation, abuse and harassment that occurs in the course of their collaboration with ICEP.

Reporting and Safeguarding

Complaint Mechanism and Whistleblowing Policy

ICEP has established a Complaint Mechanism and Whistleblowing Policy to ensure that any suspected illegal behavior, such as fraud, theft, corruption, bribery, antitrust breaches, manipulation of accounting documents as well as sexual exploitation, abuse, or harassment, is reported to the organization. ICEP's employees, donors, implementing partners, subcontractors, and other stakeholders are encouraged to report any suspected breaches of the Code of Conduct, laws, regulations, or internal rules and guidelines as well as sexual exploitation, abuse and harassment. To protect whistleblowers and encourage effective reporting, ICEP does not tolerate discrimination or retaliation against any person who reports suspected misconduct or provides evidence in good faith. While ICEP understands it may not always be easy to raise concerns about possible misconduct, the organization encourages anyone with concerns to come forward and speak up if they feel concerned about specific comments or actions of another employee or superior. All concerns will be dealt with appropriately and confidentially.

Reporting Channels

- **Ask for a personal conversation:** either one-on-one between the parties concerned or in the presence of a trustworthy person.
- **Consult the office, if need be anonymously:** either through a confidential letter to ICEP, Möllwaldplatz 5, 1040 Vienna, Austria or an email to whistleblowing@icep.at. These reports will be received and dealt with directly by the General Secretary of ICEP (who is also member of the board of trustees).
- **Contact a trustworthy colleague:** Often it helps to contact a friend within (or indeed outside) the work environment to discuss the issues at hand and seek orientation about how to proceed.
- **Contact a trustworthy superior:** This could be the team leader, the director, even a board member or any other superior you can trust.

All reported issues will be promptly followed up on and treated with absolute confidentiality. There will be no retaliation for such reporting.

Complaints about ICEP's Partners

If a partner organisation receives a complaint about their own staff, volunteers, consultants or representatives, ICEP expects the partner to respond quickly and appropriately, and to inform the Project Manager or the Managing Director about the case and how it will be addressed. ICEP will support its partners in dealing with any issue when requested. If there is reason to believe that a partner has dealt inappropriately with an allegation, the partner risks withdrawal of funding or termination of collaboration.

Mechanisms

Overarching Guidance

Abuse may be current, recent, or historical. There are no time limitations for reporting and taking action, although ICEP encourages that reports are made as soon as knowledge, or suspicion, of an act of harassment, exploitation or abuse occurs. The following points present guidance in case of sexual exploitation, abuse and harassment:

- Anonymous complaints may be made by the victim but are discouraged as they can make it challenging to address and follow up on the issue effectively.
- Affected individuals may address the contact person to receive support and counselling as needed. All support will be carried out with the highest confidentiality and will prioritise the rights, needs, and wishes of the victim/survivor while ensuring procedural fairness to all parties. A direct conversation between the affected person and the accused person only takes place if the affected person has given explicit consent.
- Confidentiality will be maintained throughout the complaints process by all staff and witnesses. Staff members who breach confidentiality are subject to disciplinary action, up to and including termination of employment.
- All involved parties will not experience any professional disadvantages as long as the presumption of innocence applies. For precautionary measures, affected staff can be transferred to other departments or teams or can take paid leave.
- Depending on the circumstances and the persons involved, a decision to seek a qualified internal or external specialist to act as mediator in the sexual exploitation, abuse and harassment case may be taken.

Support for Survivors and Victims

ICEP will make necessary arrangements for support to be offered to survivors/victims of sexual exploitation, abuse and harassment. Support can include specialist psycho-social counselling, and/or access to other specialists (e.g. medical and/or legal aid) and appropriate support as needed. Survivors and victims have the right to choose if and when they would like to take up the support options available to them.

Prevention of Retaliation Against Complainants, Victims and Witnesses

ICEP will take action against any staff, regardless of whether they are the subject of a complaint, who engage in retaliatory actions against complainants, victims, or other witnesses. Staff found to engage in such behavior are subject to disciplinary action, up to and including termination of employment.

False Allegations

Defamation, slander, and false accusation are criminal offences. While there will be no retaliation for bona fide reporting of a suspected breach of this policy, ICEP reserves the right to impose sanctions on a staff member if they are found to have made knowingly false allegations. These sanctions may include demanding a written apology to the person concerned, arranging a binding and controllable behavior modification procedure with set appointments and deadlines, issuing a written reprimand with a threat to terminate the contract, implementing organizational measures (e.g., transfer), granting a leave of absence, issuing oral reprimands, serving a notice of termination, terminating employment without notice, reporting the offender to the police, or taking legal action.

ICEP's Safeguarding

This policy outlines the safeguarding conduct expected of ICEP employees and related personnel to protect individuals from sexual harassment, exploitation, and abuse. Specifically, ICEP expects employees to:

- Foster a safe and equitable organizational culture that prevents and opposes sexual harassment, exploitation, and abuse towards children and adults.
- Treat everyone with dignity and respect.
- Immediately report any concerns regarding possible violations of this policy, in confidence, and in line with the available reporting channels.
- Share sensitive information that relates to concerns of sexual harassment, exploitation and abuse. For the respect, dignity and safety of everyone involved, it is essential to maintain confidentiality about any concerns or information and only share information with staff of the appropriate function on a need-to basis. Breach of this policy may put others at risk and can therefore result in disciplinary procedures.
- Ensure that another adult is present when working with children.
- When photographing or filming a child, obtain informed consent from the parent or guardian, explain how the photograph or film will be used, present children in a dignified and respectful manner, ensure they are adequately clothed, and not in poses that could be seen as sexually suggestive, ensure images are honest representations of the context and facts, and file labels do not reveal identifying information about a child, such as name and exact location.



Code of Conduct

Similarly, ICEP employees and related personnel are expected to not:

- Sexually harass, exploit or abuse anyone, understanding that these behaviours are grounds for disciplinary action, up to and including dismissal.
- Engage in any form of sexual activity or develop physical/sexual relationships with people under the age of 18, regardless of the local age of consent. It is understood that ignorance or mistaken belief in the age of a child is not a defence.
- Exchange money, employment, goods, or services for sex, including sexual favours or other humiliating, degrading or exploitative behaviour.
- Recklessly engage in a sexual activity or sexual relationship with program participants/ beneficiaries. Such relationships can be compromising since they can be based on unequal power dynamics and may undermine the credibility and integrity of the program. Relationships with programme participants or beneficiaries must be reported to the program director or managing director.
- Request any service or sexual favour from participants of ICEP programs, children or others in the program communities, or to engage in sexually harassing, exploitative or abusive relationships.
- Support or take part in any form of sexually exploitative or abusive activities, including, for example, child pornography, trafficking of human beings or child marriage.
- Hire children for domestic or other labour, which is inappropriate given their age or developmental stage, interferes with their time available for education and recreational activities or which places them at significant risk of injury or exploitation.
- Use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.





ICEP is an independent Austrian development organisation with a business-oriented focus. ICEP works with partner organisations in Africa and Latin America as well as with Austrian companies and implements projects worldwide with the aim of getting more people actively involved in economic life. The corporAID platform is an initiative of ICEP.

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