

# MSI Adult Safeguarding Policy

## 1. Introduction

MSI Reproductive Services (**MSI**) provides sexual and reproductive healthcare through its Global Partnership, including our head office in London, and offices in 36 countries around the world (**Country Programmes**). MSI believes that living 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 principle mission. Our programmes 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.

MSI takes a zero-tolerance approach to all forms of exploitation, abuse, and harassment. We recognise that it is more likely to occur where individuals are vulnerable and/or dependant 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 of MSI and its clients or those it interacts with in the community. All representatives of MSI 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 MSI.

MSI's approach to Adult Safeguarding is set out in this document in the sections summarised below. There is a separate policy that deals with Child Safeguarding.

### Section 1: Introduction

**Section 2: Scope and Purpose:** who is covered by this policy, that the policy applies inside and outside of work, and the other policies which should be read with this Adult Safeguarding policy.

**Section 3: Definitions:** how we define Safeguarding, vulnerable adults and types of abuse.

**Section 4: MSI's Adult Safeguarding Commitment:** what is involved in our commitment to safeguard clients, team members and MSI and the importance of our Code of Conduct.

**Section 5: MSI's Safeguarding Programme Overview:** the MSI approach to *Preventing* (section 5.1) and *Responding* (section 5.2) to incidents and sets out the core implementation requirements for this safeguarding programme. In section 5.2 it sets the time limits for reporting incidents and how incidents are handled.

**Section 6: Roles and Responsibilities:** the different roles responsible for implementing this policy.

**Section 7: Adult Safeguarding Standards and Expectations:** this sets out specific expectations and ways of working with people in order to reduce the risk of safeguarding allegations or incidents.

## 2. Scope and Purpose

- 2.1. This document sets out MSI's standards and expectations in order to prevent any adult experiencing exploitation, abuse, or harassment within the care of MSI.
- 2.2. This document 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 vulnerable adults seeking our services. For guidance on SGBV, counselling and consent please consult [MSI's Global Medical Development Team](#).

- 2.3.** This policy applies to all persons at MSI, including all employees, contractors, trainees, volunteers, sessional workers, and agency / locum staff workers (collectively, **MSI People**, and individually, an **MSI Person**).
- 2.4.** The principles in this Policy are also expected to be upheld by MSI's partners, including social franchisees, consultants, suppliers, interns, visitors, external partners and any other third parties receiving funds or any kind of support from MSI (**MSI Partners**).
- 2.5.** Visitors to MSI's programmes e.g., donors, partners, journalists should be briefed on MSI's approach to safeguarding vulnerable adults and made aware that the principles of this policy apply to them whilst visiting our programmes.
- 2.6.** This policy applies both during, and outside normal 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 5.2.1.
- 2.7.** 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 MSI, including our clients, our staff and partners, and the communities in which we work:
- [MSI's Code of Conduct](#)
  - [MSI's Child Safeguarding Policy](#)
  - [MSI's Anti-Modern Slavery and Human Trafficking Policy](#)
  - [MSI's Anti- Sexual Harassment Policy](#)
  - [MSI's Speaking Up Policy](#)
  - [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's Operational Guidance for SGBV](#)
  - [MSI Commitment to Gender Equality](#)
  - [MSI Global Equality and Diversity Policy](#)

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## 3. Definitions

**3.1. Safeguarding** is the responsibility organisations have to ensure their staff, operations, and programmes do no harm to children, vulnerable adults, and the people delivering their services and that they do not expose them to the risk of harm and abuse.

### 3.2. Types of Harm

Harm and abuse may take many forms including, but not limited to:

- **Sexual abuse** meaning actual or threatened physical intrusion of a sexual nature, whether by force or under unequal coercive conditions.
- **Sexual exploitation** meaning 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 harassment** meaning 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.
- **Online sexual abuse and exploitation** meaning the use of technology or the internet to facilitate the sexual exploitation of a vulnerable adult, 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 vulnerable adults for sexual purposes.
- **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.
- **Discrimination** meaning any form of unfair or prejudicial treatment of a person based on their characteristics such as: age, disability, nationality, ethnicity, indigeneity, religious or political belief, socio-economic status or caste, family or criminal background, sexual orientation or gender identity, marriage status, pregnancy or HIV/AIDs status.
- **Domestic violence** referring to any incident or pattern of incidents of controlling, coercive or threatening behaviour, physical, sexual, or emotional abuse towards an intimate partner or family member.
- **Financial abuse** referring to the theft or misuse of a person's property, money, or belongings without their permission.
- **Psychological / emotional abuse** referring to the wilful infliction of mental suffering on a person (for example, acts of intimidation, humiliation, threats, denial of respect and dignity).
- **Neglect** where a person ignores a person's medical, physical, or emotional care needs (for example: withholding pain relief).
- **Physical abuse** occurring when a person purposefully injures a person, for example, slapping, hitting, punching, shaking, kicking, burning, restraints, or misuse of medicines etc.

3.2.1 Harm and abuse are not always standalone events that can be covered by one definition. Safeguarding cases often incorporate a variety of concerns, which can either be single or repeated acts.

3.2.2 MSI recognises that safeguarding concerns may relate to all types of harm and abuse, however we acknowledge that our key risks relate to sexual exploitation, abuse, and harassment (**SEAH**).

### 3.3. Vulnerable Adults

MSI recognises that everyone has the potential to experience vulnerability at some point in their lives and should therefore be safeguarded from harm.

3.3.1. Vulnerable adults are individuals aged 18 years or above (see MSI's Child Safeguarding Policy for approaches taken to safeguard those under 18 years of age) who have the potential to be less able to take care of themselves and/or defend themselves against exploitation, abuse, and harassment, on either a temporary or permanent basis, 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.

These circumstances can increase an individual's risk of feeling unable or unwilling to express their preferences due to their lack of status or dependence, putting them at real or perceived risk of suffering unacceptable consequences should they not agree. Those in dependent relationships may also hope for favouritism if they consent.

There are particular groups of individuals, often marginalised in society who may have a collectively higher risks of feeling or being unable to defend themselves from exploitation, abuse, and harassment including:

- People living with moderate or severe disability
- People living with incurable or stigmatised health conditions e.g., HIV
- People affected by acute or permanent mental illness
- People with no or low levels of literacy or education
- People dependant on others for basic needs or survival
- People living in poverty or insecure financial circumstances
- People affected by displacement e.g. refugees
- People identifying with a minority sexual orientation or gender identity
- People already experiencing, or having previously experienced exploitation or abuse, including but limited to domestic violence, sexual assault, modern slavery, and human trafficking
- Ethnic or religious minorities

Note: Whilst certain groups may experience an increased risk of vulnerability, it cannot be universally assumed that everyone within this group will experience vulnerability.

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## 4. MSI's Commitment to Adult Safeguarding

**4.1.** MSI acknowledges that in the delivery of our services, there is a potential to increase safeguarding risks to all adults, including vulnerable adults, 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. We take 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. Our programmes aim to assess risks and work to actively minimise the likelihood of vulnerable clients experiencing intentional or unintentional exploitation, abuse, and harassment. Where exploitation, abuse or harassment does occur within our operations, MSI will respond quickly to support survivors of abuse and prevent ongoing and future risks of harm.
- **Safeguard team members** by promoting a safe working environment. We do not tolerate exploitation, abuse, harassment, or discrimination against any MSI Person or Partner and are committed to quickly responding and taking necessary action if it does occur.
- **Safeguard MSI** 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 MSI's reputation and our ability to continue to deliver on our mission, for the ultimate benefit of the clients and communities we serve.

**4.2.** MSI's commitment to safeguarding adults is guided by the principles articulated in our Code of Conduct:

- **Zero tolerance:** MSI does not tolerate any form of sexual exploitation, abuse, or harassment, bullying or discrimination, by anyone who works for, or is associated with the organisation in any capacity. There are always consequences for substantiated concerns of such behaviour, up to and including dismissal.
- **Strong leadership:** MSI recognises that to change culture and prevent any form of harm, exploitation, abuse or harassment, strong leadership modelled on respect and equality that promotes a safe and supportive organisational culture which prioritises safeguarding and speaking up, is required.
- **Empowerment and Client-centred Care:** MSI promotes a culture which puts clients interest first, where they are treated with genuine care and compassion, and feel safe and able to make informed decisions about their care, provide feedback, and speak up when something doesn't feel right.
- **Non-discrimination:** MSI is committed to safeguarding all vulnerable individuals within our operations regardless of their: age, disability, nationality, ethnicity, indigeneity, religious or political belief, socio-economic status or caste, family or criminal background, sexual orientation or gender identity, marriage status, pregnancy, or HIV/AIDs status.
- **Shared responsibility:** All representatives of MSI have an equal duty to ensure vulnerable adults are treated with care and respect and speak up if they are not.
- **Prevention:** MSI understands that risks of abuse within MSI's operations are real and may be under-reported. We are committed to identifying areas of our work where concerns are more likely to arise and put in place mitigations to change behaviours to prevent exploitation, abuse, and harassment.

- **Confidentiality:** Safeguarding adults from harm also means safeguarding their rights to privacy and confidentiality in line with MSI's Data Privacy Standards and local legislation.
- **Partnership:** Communities can help prevent, detect, and report incidents of exploitation, abuse and harassment. MSI expects all staff to be open to receiving community feedback and to support those who provide it. Where possible MSI will form strategic partnerships with existing service providers and experts in the community who are able to provide specialist support to anyone who suffers abuse within MSI's operations and ensure there are appropriate referral pathways. Further details are outlined in Section 5.2.2 (d).
- **Survivor-focused:** All reported violations of this policy will be managed in a way which prioritises the best interests of the survivor. All safeguarding concerns are handled sensitively, confidentiality maintained at all times, and support provided to survivors where necessary.
- **Accountability and Transparency:** MSI has mechanisms in place to ensure management and team members uphold their duties and responsibilities for safeguarding and is committed to transparent reporting on safeguarding incidents.

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## 5. The Objectives of the MSI Safeguarding Programme

MSI's Safeguarding Programme sets a benchmark of good practice and accountability with the aim to:

- **PREVENT** incidents of abuse, exploitation, and harassment from occurring across the MSI Partnership.
- **RESPOND** quickly and sensitively to any safeguarding incidents that do occur.

### 5.1. PREVENTION

#### 5.1.1. TRAINING

Every MSI Person and Partner has a role to play in safeguarding all adults, particularly vulnerable adults. To fulfil that role effectively and with confidence, all MSI Persons must complete a safeguarding induction training during onboarding and every two years thereafter. Additionally, all MSI Persons are required to complete refresher training, at least once every 2 years. We recommend that such training is scenario or case study based, to enable staff to consider actual issues and events that they may come across. This ensures they have a clear understanding of:

- the ethical standards of conduct expected of them
- the behaviours which constitute sexual exploitation, abuse and harassment, and other forms of individual harm which violate MSI's Safeguarding Policies
- their duty to report all known, or suspected, safeguarding concerns
- how to sensitively respond to safeguarding concerns and use MSI's Speak Up Channels to report issues

Trainings are expected to be supported through continuous messaging and discussions across all levels of the organisation.

#### 5.1.2. SAFE RECRUITMENT

MSI is committed to recruiting safe people, whom we can trust to uphold our commitments to safeguarding and client-centred care. For this reason, MSI employs a range of safe recruitment practices. These procedures not only aim to identify high-risk individuals, including those unlikely

to treat MSI's clients and staff with dignity and respect, but to make our safeguarding commitments clear to candidates and deter unsuitable individuals from applying. These are:

- 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 and that MSI conducts background checks on all new hires.
- b. **Interviews:** recruiters ask values-based interview questions designed to assess whether candidates' values and behaviours align with that of MSI's and to identify and rule out candidates unsuitable for working with children and vulnerable adults.
- c. **Background checks:** the following checks are carried out for all successful candidates before employment is confirmed:
  - 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 background checks (where available in country) and database vetting checks to identify concerns relating to money-laundering, terrorist activities or past criminal convictions.
- d. **Reference checks:** Verbal or written references are obtained from at least 2 of candidates most recent employers. References for roles with direct contact with clients should enquire about the candidate's suitability to work with children and vulnerable adults.
- 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 MSI's Code of Conduct.
- f. **Employment contracts:** Employment contracts and/or human resources policies and procedures contain provisions for disciplinary sanctions 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 MSI Code of Conduct and/or MSI Policies including the adult and child safeguarding policies. .

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

### 5.1.3. RISK MANAGEMENT

MSI is committed to identifying the areas within our operations where there is increased potential for anyone to be harmed by our operations, including through programme design or at the hands of MSI People or MSI Partners. By assessing our risks, we can identify mitigations designed to prevent safeguarding concerns from occurring and strengthen our responses to any incident which does occur. MSI employs the following risk management approaches:

- a. **Safeguarding Risk Assessments:** Country Programmes are required to maintain a Safeguarding Risk Register reflecting the unique contexts and safeguarding risks faced within the programme. Throughout the risk assessment risks are scored according to their likelihood and severity, mitigations identified, and risk managers assigned to monitor the risks and ensure mitigations are implemented effectively. Safeguarding Risk Registers are submitted to the Global Safeguarding Team and reviewed by the Country Programme on an annual basis [See – [CP Safeguarding Risk Assessment](#) ].
- b. **Safeguarding Annual Self Audit:** - Country Programmes are required to review how well they are implementing the safeguarding programme by undertaking a self-assessment annually. The results of this assessment will guide the Country Programme's management on areas that require focus to better manage safeguarding risks. See- [CP Safeguarding Self-](#)

#### Audit

- b. **External Partner Due Diligence:** MSI conducts due diligence assessments on external partners (i.e., a non-profit or commercial entity receiving funds from MSI to deliver on programmes MSI is accountable for), 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 vulnerable adults are harmed by the External Partner. Where safeguarding incidents do occur, External Partners are required to notify MSI immediately (within 24 hours) by emailing [incidents@msichoices.org](mailto:incidents@msichoices.org).
- c. **Safe Programming:** MSI's programme activities are designed in a way which prioritises the best interests of the client. Programme designs consider measures to protect children and vulnerable adults from exposure to unnecessary risks of harm, safeguard personal data and ensure that client participation is inclusive and voluntary.

#### 5.1.4. CODE OF CONDUCT

The Code of Conduct provides guidance on the organisational values and standards MSI People are expected to adhere to as representatives of MSI, both in the workplace and outside of the workplace. This includes the professional boundaries and behaviours expected of them when interacting with others. All team members sign a declaration of their commitment to adhere to the standards outlined within the Code of Conduct.

### 5.2 RESPONDING

#### 5.2.1. SPEAKING UP

We are committed to preventing harm to all adults under MSI's care. However, like all organisations, we face the risk of our activities going wrong and people experiencing harm, abuse, or exploitation at the hands of an MSI Person or Partner, whether intentionally or unintentionally. As "One MSI", we need to work together to identify situations where this is happening, in order to rectify the issue and provide support to at-risk adults.

MSI People and Partners, as well as clients and community members must Speak Up about any concerns relating to a known, or suspected incident of sexual exploitation, abuse, or harassment, or any other violation of MSI's Code of Conduct or Safeguarding Policies by an MSI Person or MSI Partner. It is important that team members do not attempt to investigate concerns themselves or postpone reporting until more evidence can be collected. Concerns discovered by MSI People or Partners must be raised immediately to enable the organisation to act quickly to protect victims from potentially ongoing risks of harm.

- a. **MSI team members** can raise concerns by:
  - Speaking with their Line Manager
  - Speaking with the Country Director (in the case of Country Programmes)
  - Speaking with their team Director or the Safeguarding Lead (in the case of Support Offices)

- Contacting SafeCall, MSI's confidential and independent speaking up service. SafeCall can be accessed via:
  - Telephone: see [here](#) for country telephone numbers
  - Online: [www.safecall.co.uk/report](http://www.safecall.co.uk/report)
  - Email: [speakingup@safecall.co.uk](mailto:speakingup@safecall.co.uk)
- b. **MSI Partners** can raise concerns via the agreed reporting channels outlined within their contractual agreement e.g., by:
  - Speaking with the MSI Country Director
  - Emailing MSI's Partner Incident Reporting account: [incidents@msichoices.org](mailto:incidents@msichoices.org)
- c. **Clients and community members** can raise their concerns by:
  - Speaking directly to an MSI team member
  - Getting in touch with the country programme Contact Centre

The Speak Up Channels are advertised via client-facing and staff-facing [Speak Up Posters](#) visible across MSI's offices and service delivery sites.

Further guidance on how to speak up and what happens after you speak up, including how MSI supports report raisers, can be found in the following documents:

- [MSI's Speak Up Policy](#)
- [A Guide to Speaking Up](#)

### 5.2.2. INCIDENT RESPONDING

MSI is committed to taking a survivor-focused approach to incident management, whereby the safety and wellbeing of those affected by safeguarding concerns remains the overriding priority at all times. We have in place robust reporting and responding procedures to ensure concerns are handled quickly, efficiently and through a survivor focused lens.

- a. **Escalation and Time limits for reporting:** Reports of any potential breach of MSI's Safeguarding Policies received by MSI team members and Line Managers must be escalated to the Country Director, their delegate, or the Safeguarding Lead and logged on the Global Safeguarding Incident Register within 24 hours. Reports received via SafeCall or the Global Safeguarding Teams are logged on the register by the Global Safeguarding Team within 24 hours. In instances where there are reasons to believe that an allegation is not credible, the Country Director may have 72 hours to assess and report the allegation on the register. If deemed not credible, the allegation should still be logged but the case marked as closed together with reasons. The Global Safeguarding Decision Committee is then automatically notified of all safeguarding new cases but will take no further action if a case has been marked closed and no concerns are raised after a review.
- b. **Case Management by Incident Type:** All concerns relating to sexual exploitation, abuse or harassment, discrimination, or violence by, or towards, an MSI Person must be recorded on the Global Safeguarding Incident Register. Management of these cases is overseen by a Global Safeguarding Decision Committee. Concerns relating to bullying and harassment are managed by the Country Programme Human Resource team, with advice sought from the Global Safeguarding Decision Committee as required, for example: where there are persistent bully complaints relating to a particular team or individual or bullying concerns which include potential sexual or gender-based components.
- c. **The Global Safeguarding Decision Committee:** ensures consistency in the management of safeguarding cases across MSI Country Programmes. They review all reports and provide guidance on survivor and/or report raiser support and protection, investigations, outcomes, disciplinary action (where required) and external reporting requirements, including

transparent reporting to MSI's Donors and the UK Charity Commission. The Decision Committee also considers actions required to prevent repeated similar incidents from occurring across the organisation.

The Decision Committee can be comprised of the Chief Operating Officer, Regional Director, Country Director, Global Director of Legal, Safeguarding and Donor Compliance, Global Director of People & Culture and Director of Global Programmes, Philanthropy and Global Funding and Multilateral Programmes. Other expertise is seconded as needed.

Any concerns raised about members of the Decision Committee can be logged on a Restricted Register and managed by a Restricted Decision Committee.

- d. **Survivor Support:** It requires courage to speak up about abuse. Survivors can be wrongly made to feel as if they are to blame, and they are likely fearful of what their abusers would do if they found out they reported. MSI therefore encourages team members to adopt the LIVES approach<sup>1</sup> when listening to reports of abuse, to help survivors feel safe, protected, and supported.

**Listen** closely with empathy and no judgement  
**Inquire** about needs and concerns  
**Validate** their experience, show you understand  
**Enhance** their safety and do no harm  
**Support** them to connect to additional services

Where available MSI will identify organisations where survivors can be referred for specialist support, such as psychosocial support, comprehensive sexual, gender-based violence (SGBV), forensic examination, legal support, on-going medical assistance, protection, and follow-up care. The organisations/facilities identified must demonstrate adequate standards of care and treatment, and assurances of their commitment to maintain confidentiality and provide quality and sensitive care must be gained, ideally in a written agreement.

- e. **Investigations:** Incidents relating to an MSI employee, contractor, agency / locum team member, social franchisee or MS Lady will either be conducted by the Country Programme or support office, with external expertise sought as required. Incidents relating to an employee of an external partner will be managed in line with the partners internal investigation procedures. MSI is committed to maintaining the privacy and confidentiality of all parties including any survivors, the report raiser, and the accused at all stages of the investigation and following the closure of the case.
- f. **Disciplinary Action:** Incidents of exploitation, abuse, and harassment are serious offenses. Where cases are substantiated the 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

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 survivor.

<sup>1</sup> WHO 2013

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## 6. Key roles and responsibilities

### 6.1. All MSI People and Partners

All representatives of MSI share an obligation to prevent, report and respond to all safeguarding concerns. MSI people are expected to uphold MSI's Code of Conduct and Safeguarding Policies, abiding by the standards and expectations outlined within Section 8 and report any known or suspected violations of this policy via MSI's Speak Up Channels as outlined in within Section 5.2.1.

### 6.2. Global Safeguarding Team

The Global Safeguarding Team are accountable for the development and implementation of the safeguarding programme across the global partnership. The Safeguarding Team develops policy and guidance, designs behaviour change initiatives and trainings, provides one-to-one support to country teams. The Safeguarding Team also monitors country compliance and provides updates on safeguarding activities, risks, and incidents to the MSI Board of Trustees and Donors.

### 6.3. Country Directors

Country Directors (**CDs**) are responsible for their Country Programme's compliance with this policy and relevant donor expectations for safeguarding. CDs have a duty to ensure the Country Programme has in place the appropriate mechanisms, systems, and resource to effectively implement all components of MSI's Safeguarding Programme. CDs must provide clear guidance to team members on how to prevent safeguarding incidents from occurring within the programme and encourage confidence in MSI's safeguarding programme, by promoting a safe and supportive organisational culture which prioritises safeguarding and speaking up. Report raisers should not feel victimised for speaking up. The CD has the responsibility of protecting report raisers and victims of safeguarding. Where potential safeguarding concerns are identified within MSI's operations or that of our partners, the CD is responsible for ensuring incidents are responded to in line with Section 5.2.2. of this policy.

### 6.4. Safeguarding Leads

Every Country Programme has in place 1 or 2 nominated Safeguarding Leads. Safeguarding Leads have a duty to support the CD in ensuring the programme complies with the MSI's Safeguarding Policies and relevant donor expectations. Safeguarding Leads foster a safe culture within the country by delivering safeguarding training and continuous messaging designed to promote ethical behaviour change, identifying potential safeguarding challenges, promote the use of safe recruitment practices, and reporting requirements and processes, ensure safeguarding risks are assessed and mitigated against, and make sure that where incidents do occur, they are quickly and sensitively responded to in line with the best wishes of the survivor. Safeguarding Leads are expected to actively engage with the Global Safeguarding Community of Practice, a forum which provides a space for peer-to-peer learning and sharing of best practice and common challenges.

### 6.5. Managers

Managers have a responsibility to ensure all those working for them understand and comply with MSI's Safeguarding Policies. Line managers have a duty to act as role models, practice safe recruitment and ensure staff are thoroughly sensitised on MSI's safeguarding policies, the Code of Conduct and Duty of Care (for clinical staff) through regular discussions. Where Managers become aware of suspected or known safeguarding concerns they must ensure this is escalated to the Safeguarding Lead, Country Director, or Regional Director within 24hrs.

## 6.6. Human Resource Teams

Human Resource Teams have a responsibility to ensure the Country Programme implements robust safe recruitment practices and all staff complete mandatory training on MSI's Code of Conduct, safeguarding and provider's duty of care (for clinical staff). HR Teams must also ensure that HR and performance management processes support an accountable and safe organisational culture. Where HR team members come across potential safeguarding concerns, these must be escalated to the Country Director within 24hrs.

## 6.7. Programme and Channel Leads

Channel Leads are responsible for assessing and mitigating safeguarding risks unique to their programme activities. This includes raising awareness of MSI's Speak Up Channels and how they can be used to report safeguarding concerns by staff, partners, clients, and community members, and escalating potential safeguarding concerns to the Country Director and/or safeguarding lead. Programme Leads must also ensure relevant donor expectations for safeguarding are complied with.

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# 7. Adult Safeguarding Standards and Expectations

The following standards of conduct have been outlined in order to ensure vulnerable adults, MSI People and MSI Partners are safeguarded from all forms of harm.

## 7.1. At all times (whilst carrying out professional activities or whilst acting in a personal capacity outside work) MSI People and Partners 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 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.

## 7.2 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.

## Policy Version Control

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Applies to:	All MSI team members
Written by:	Global Policy Engagement Manager
Approved by:	Global Director of Legal, Safeguarding and Donor Compliance
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