



GOAL Protection from Sexual Exploitation, Abuse and Harassment (PSEAH) Policy

October 2021

GOAL Protection from Sexual Exploitation, Abuse and Harassment (PSEAH) Policy

Members:	<ul style="list-style-type: none"> • all board members/trustees, board committee/advisory board members and company members of each of GOAL, GOAL (International) and GOAL USA Fund, together with GOAL’s branches/liaison offices in programme countries. • all GOAL employees (Head Office and Field), secondees, interns and volunteers. • all consultants* (including internal consultants with a GOAL email address). • all contractors/suppliers** • all GOAL partners* (those entering into partnership agreements with GOAL, GOAL (International) and GOAL USA Fund); and • all GOAL visitors (defined as all visitors to any of GOAL’s programming operations, namely those acting as representatives of donors and funding partner organisations (e.g. universities, INGOs, corporates), guest visitors, and/or all people associated with GOAL programming). <p>*adheres to the GOAL’s Code of Conduct OR has in place their own internal Code of Conduct which provides equivalent or greater protection, and they certify compliance periodically.</p> <p>** adheres to GOAL Supplier Code of Conduct, which is applicable from September 2020.</p>
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1. Introduction

In this PSEAH Policy, reference to GOAL will include reference to GOAL in Ireland; GOAL (International) in the UK, GOAL USA Fund in the US and all GOAL branches and/or liaison offices, as well as other entities established in programme countries from time to time (together hereinafter referred to as “GOAL”).

GOAL is committed to the protection from sexual exploitation, abuse and harassment (PSEAH) by its Members and by humanitarian workers and recognizes the vulnerability of every person regardless of gender, but also recognizes the particular vulnerability of women, girls and boys to sexual exploitation, abuse and harassment (SEAH) as well as the inherent power dynamics evident within humanitarian and development partnerships. Humanitarian workers and managers hold positions of power over the population they serve, their staff and implementing partners.

We have an obligation to use our power respectfully and must not abuse the power and influence we have over the lives and well-being of the participants of our programmes and others in the communities where GOAL works. “Do No Harm” is a core principle of humanitarian action, and GOAL is committed to giving this principle the adequate resources and attention to be implemented at all levels and ensure that this policy is adhered to.

The Code of Conduct 2021¹ highlights that abuse, harassment, and discrimination based on gender and sexual orientation are not acceptable in the workplace and in our contracts with others.

2. Purpose

The purpose of this PSEAH policy is to ensure that all GOAL Members make ethical decisions in their professional and personal lives to ensure the protection of people, particularly children and vulnerable adults, protecting them from sexual exploitation, abuse and harassment (SEAH) by GOAL Members and to ensure that the activities of GOAL are implemented in a safe and protective environment as far as reasonably possible and responded to effectively.

The policy lays out the commitments made by GOAL and informs GOAL members of their responsibilities in relation to protection from sexual exploitation, abuse and harassment (PSEAH).

The GOAL PSEAH Policy has been developed in accordance with the six core principles, revised in 2019² by the Inter-Agency Standing Committee Task Force on Prevention and Response to Sexual Exploitation and Abuse (2019), and the principles of the United Nations Secretary General’s Bulletin on Special measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13)³.

As local laws and customs differ widely across the world, the GOAL PSEAH Policy is informed by International Human Rights Law, United Nations’ standards, and best practice guidelines from the humanitarian sector (including GOAL’s own policies and experience). It applies regardless of location and local law⁴. The GOAL PSEAH Policy is also in-line with the following:

- IASC Minimum Operating Standards; Protection from Sexual Exploitation and Abuse by own Personnel, 2019;

¹ GOAL Code of Conduct, November 2021

² <https://interagencystandingcommittee.org/inter-agency-standing-committee/iasc-six-core-principles-relating-sexual-exploitation-and-abuse>

³ <http://www.un.org/Docs/journal/asp/ws.asp?m=ST/SGB/2003/13>

⁴ GOAL Code of Conduct 2021

- The Global Review of protection from Sexual Exploitation and Abuse by UN, NGO, IOM and IFRC Personnel, July 2010;
- The Statement of Commitment on Eliminating Sexual Exploitation and Abuse by UN and Non-UN Personnel, August 2008; and
- The Core Humanitarian Standard (CHS) on Quality and Accountability⁵.
- The Inter-Agency Standing Committee (IASC) Task Force on Accountability to Affected Populations (AAP)'s Commitments on Accountability to Affected People/Populations (CAAPs)⁶.

3. Scope

The GOAL PSEAH Policy is applicable to all GOAL Members (as set out above on page two).

Any violation of the GOAL PSEAH Policy will be treated with the utmost seriousness and will be dealt with in accordance with GOAL's Disciplinary Procedures as detailed in GOAL HR Manuals and with applicable laws. This may result in a disciplinary sanction up to and including termination of employment, as well as legal action.

Those in positions of authority in GOAL have a particular duty to ensure adherence by both themselves and others to the GOAL PSEAH Policy and to support and develop appropriate systems to facilitate compliance, disclosures and follow up.

All Partners and contractors/suppliers are expected to be committed to the GOAL PSEAH Policy and will be provided with a copy of GOAL's PSEAH Policy or their own PSEAH policy, provided their standards are equivalent to GOAL's PSEAH Policy. Contractors/suppliers will also be required to sign GOAL's Supplier Code of Conduct.

4. Definitions and Acronyms

- **Abuse** is defined as any action that intentionally or unintentionally harms or injures another person. In many cases, it is characterized by unbalanced power relationships between stakeholders (the abuser and the victim).
- **A disclosure** is defined as a specific allegation of abuse made against a named individual.
- **GOAL Board** is defined as GOAL 's Board of Directors, GOAL UK (International) (trading as GOAL UK) Board of Directors, and GOAL USA Fund's Board of Directors.
- **Protection from Sexual Exploitation and, Abuse (PSEA and Harassment (PSEAH))** is the term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse and harassment of affected populations by staff or associated personnel. The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13)
- **Sexual abuse** means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- **Sexual exploitation** means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. This definition includes human trafficking and modern slavery.
- **Sexual harassment** is any form of unwanted verbal, non-verbal or physical conduct of a sexual nature which has the purpose or effect of violating a person's dignity and creating an intimidating, hostile,

⁵ GOAL is a full member of the CHS alliance

⁶ Namely: 1) leadership, 2) transparency, 3) feedback and complaints, 4) participation, and 5) design, monitoring and evaluation

degrading, humiliating or offensive environment for the person. The unwanted conduct may include acts, requests, spoken words, gestures or the production, display or circulation of written words, pictures or other material. Sexual harassment can be perpetrated against program participants, community members, and GOAL Members as defined on page two.

- **Suspicion** is when a concern is expressed about abuse that may have taken place or concern that abuse may take place.
- **Trafficking in Persons** is the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.
- **Survivor** is the person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience, and the capacity to survive, however it is the individual's choice how they wish to identify themselves.
- **Sensitive cases** are cases where individuals or groups are harmed, discriminated against, exploited, or neglected by individuals. GOAL uses two levels of Safeguarding Incidents to determine GOAL's response, which is based on the seriousness of the incident and GOAL's role. These categorisations of incidents align to GOAL's Complaints Feedback Mechanism.
 - **Category 5 – Safeguarding:** An issue, complaint, or disclosure relating to any incident of verbal abuse or one-off/first time harassment (including online abuse) relating to GOAL staff, programme, or its partners. Any form of abuse or exploitation within GOAL's area of operation but unrelated to GOAL, GOAL staff, or GOAL partners, that GOAL becomes aware of.
 - **Category 6 – Safeguarding:** An issue, complaint, or disclosure relating to any incident of physical abuse, sexual abuse, child abuse, sexual exploitation, child exploitation, or repeated harassment concerning GOAL, GOAL staff, or GOAL partners.

5. Policy Statement

GOAL has a zero-tolerance approach to sexual exploitation, abuse and harassment of any person, child or adult, involved with its programmes. GOAL's Protection from Exploitation, Sexual Abuse and Harassment Policy (PSEAH) outlines our Safeguarding commitments towards SEAH.

All Members (as outlined on page two of this Policy) must not engage in:

- a. Sexual exploitation, abuse and harassment of programme participants or others in the communities we serve.
- b. Sexual activity with children (persons under the age of 18). This is prohibited regardless of the age of majority or age of consent locally. Ignorance or mistaken belief regarding the age of a child is not a defence.
- c. Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. This includes the exchange of assistance that is due to programme participants.
- d. Sexual relationships between GOAL Members and participants of GOAL programmes are prohibited since they are based on inherently unequal power dynamics.
- e. Harassment, discrimination, exploitation, and abuse based on gender (including pregnancy) and sexual orientation in the workplace or towards partners and service providers.

Additionally,

- f. Where a GOAL Member develops concerns or suspicions regarding sexual abuse, exploitation or harassment by a client to this Policy, whether in the same agency or not, he or she must report such concerns via GOAL's established reporting mechanisms.
- g. GOAL Members are obliged to create and maintain an environment which prevents sexual exploitation, abuse and harassment and promotes the implementation of the GOAL PSEAH Policy. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.
- h. The GOAL PSEAH Policy encompasses all types of exploitation and organised abuses of power and has a zero-tolerance policy towards GOAL Members who are exploiting human beings for their benefit including exploitation, forced labour, child labour⁷, slavery and trafficking. These principles are embedded in the GOAL Employee Handbook, the Code of Conduct and in the GOAL Guidelines and Compliance Plan Against Human Trafficking, Exploitation and Forced Labour.
- i. The GOAL PSEAH Policy also encompasses online SEAH, GOAL is a signatory to the 'Dóchas Code of Conduct on Images and Messages, therefore all GOAL staff should adhere to the commitments set out in this code as well as GOAL's Social Media and Online Messaging Policy.

6. Measures to Implement the Policy

a. Staffing and Training

All GOAL country programmes will have a designated Safeguarding Manager or focal point who will provide leadership in implementing this Policy. They will report progress to their Senior Management Team on a regular basis. Safeguarding Managers/focal points will be trained in handling sensitive issues arising from an actual or perceived breach of the GOAL PSEAH Policy and associated protection policies.

Emergency responses which are declared a global response will appoint their own Safeguarding Focal Point.

All GOAL Members must sign an acknowledgement that they know, understand and will follow the PSEAH Policy. Signed agreements should be kept on file by the relevant office. It is the responsibility of the Safeguarding Manager or focal point where staff are stationed to ensure that all staff members and **implementing Partners receive:**

- A PSEAH induction within thirty (30) days of their employment.
- A PSEAH training within the first three (3) months of their employment.
- Periodic refresher training every two (2) years or specific trainings to meet the needs of staff roles within the local context and its accompanying risks.

Furthermore, each country office will translate GOAL's PSEAH Policy in the local national language to ensure that all staff understand and adhere to it.

Human Resources will incorporate appropriate job responsibilities (such as staff training, complaints and response mechanisms, coordinating high-level oversight and progress reports) in specific staff positions to support and ensure effective implementation of organizational strategies to prevent and respond to SEAH.

⁷ Hire children in any form of child labour (including as house help) unless it is within the best interest of the child and in alignment with local law and international standards. ('Child Labour' is work that is mentally, physically, socially or morally dangerous and harmful to children, or that interferes with their schooling. 'Child work' in contrast may be beneficial if permitted by International Labour Organisation (ILO) Conventions and puts the child's best interests ahead of any benefits gained by adults.)

Human Resources will also ensure recruitment processes use thorough background checks and also vet potential employees' attitudes towards PSEAH, in line with applicable laws.

b. Prevention Measures

GOAL Board and Senior Management

The GOAL Board is ultimately responsible for the application and implementation of the GOAL PSEAH Policy through Senior Management Teams in Head Office and in country programmes. The Senior Management Team shall hold Regional Directors to account for ensuring implementation of the GOAL PSEAH Policy including risk management processes.

The GOAL Board will ensure that adequate technical support is provided to country programmes to adapt and implement the GOAL PSEAH Policy. One member of the board is identified as the PSEAH focal point. The Advisory Board are committed to six-monthly reporting to the Board on PSEAH and breaches of the GOAL PSEAH Policy.

The CEO will be informed of all Category 6 Safeguarding cases. A yearly report, based on an internal audit is also sent by each GOAL country programme to the Head Office Senior Management Team. PSEAH policy implementation is regularly monitored by the Audit and Risk Committee.

ALL GOAL employees

Where a GOAL Member develops concerns or suspicions regarding abuse or exploitation by a client to this Policy, whether in the same agency or not, he or she must report⁸ such concerns to GOAL's internal reporting mechanism speakup@goal.ie or to our external reporting mechanism goal@safecall.co.uk.

GOAL Members are obliged to create and maintain an environment which prevents exploitation and abuse and promotes the implementation of the GOAL PSEAH Policy.

GOAL Management at HQ and Country Level

GOAL managers and supervisors must ensure that their employees and related personnel understand and comply with the GOAL PSEAH Policy and its Core Principles (see section 5, 'Policy Statement' above). Managers at all levels have particular responsibilities to support and develop systems which maintain this environment and commit to:

- i. Disseminate the GOAL PSEAH Policy within the organisation and among partners and representatives.
- ii. Adherence to the GOAL PSEAH Policy by all GOAL Members is mandatory and a contractual agreement.
- iii. Include PSEAH in risk assessment, monitoring and reporting processes e.g. Risk Register.
- iv. Develop organization-specific strategies to prevent and respond to incidents of SEAH at HQ which are led by the Global Safeguarding Advisor.
- v. Engage with stakeholders, in particular individuals, communities and governments with whom we work to address underlying root causes of SEAH.

⁸ The obligation to report is mandatory under GOAL's Whistleblowing Policy. All reported concerns will be investigated fully. Sexual Exploitation, Abuse and Harassment are extremely damaging for the victim(s), the organisation and staff (by association or if wrongly suspected)

- vi. Commit to address inherent power dynamics within humanitarian and development partnerships through promotion of meaningful engagement with stakeholders, in particular individuals and governments with whom we work to address root causes of SEAH.

c. Reporting

GOAL will ensure that safe, appropriate, accessible means of reporting SEAH concerns are made available to staff and the communities we work with. Any staff reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected by GOAL's Whistleblowing Policy. GOAL will also accept complaints from external sources such as members of the public, partners and official bodies.

How to report a concern of SEAH

Staff members who have a complaint or concern relating to SEAH should report it **immediately** to their:

1. Safeguarding Focal Point⁹ or line manager. If the staff member does not feel comfortable reporting to their Safeguarding Focal Point or line manager (for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they may report to:
2. Any other appropriate staff member. For example, this could be a senior manager or a member of the HR Team or
3. GOAL's internal mechanism Speakup@goal.ie and/or external mechanism goal@safecall.co.uk as laid out in the Whistleblowing Policy and to the
4. Global Safeguarding Advisor.

d. Response

When made aware of an alleged breach of the GOAL PSEAH Policy, GOAL will:

- Take appropriate action to the best of its capacity to protect persons from retaliation when allegations of sexual exploitation, abuse and harassment are made in good faith.
- Investigate allegations of sexual exploitation, abuse and harassment involving GOAL in a timely and professional manner, and to the best of its capacity encourage all designated stakeholders to do the same.
- Report to Authorities: Any action taken will be in accordance with GOAL's policies and procedures and informed by national legislation. Depending on the nature and circumstances of the case, as well as the interest of the complainant, GOAL will involve the appropriate authorities, including Law Enforcement, Donors, the Charity Commissioners, to ensure the protection of all programme participants and the transparency of our safeguarding processes.
- Use appropriate interviewing practices with complainants and witnesses, particularly with children. This may include engaging professional investigators or securing investigative expertise as appropriate.
- Take swift and appropriate action, including legal action when required, against employees and related personnel who commit sexual exploitation and/or abuse.
- Take swift and appropriate action against those who were aware of such abuse/exploitation but did not report it.

⁹ All GOAL country programmes will also have a safeguarding focal point trained in handling sensitive issues arising from an actual or perceived breach of the GOAL PSEAH Policy.

- Respond with a ‘survivor centred approach’¹⁰, offering support to complainants/survivors of harm caused by GOAL members, regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding support will be led by the complainant/survivor.
- Apply appropriate disciplinary measures to staff found in breach of the policy.

All GOAL staff should be made aware of the reporting mechanisms for SEAH by ensuring that reporting lines on how to raise concerns are displayed in an accessible location in all GOAL offices. This display must contain the contacts of all focal points, the internal SpeakUp@goal.ie and external goal@safecall.co.uk whistleblowing contacts and the complaints response mechanism.

e. Confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with SEAH concerns, information relating to the concern and subsequent case management should be shared on a need-to-know basis only and should always be kept secure.

f. Risk Management

GOAL will audit its operations annually to ensure that PSEAH is being addressed correctly in 4 components:

- Policy:** the GOAL PSEAH policy is applied in all GOAL country programmes, it is easily accessible to all staff, and fully understood by all GOAL Members.
- Procedures:** systems are in place to reduce risks of abuse, rumours and the possibility of harm.
- People:** staff are recruited, managed and work in an environment that addresses PSEAH through support, training, information and response.
- Accountability:** systems are in place to receive and respond to concerns, and to recognize and limit risks.

g. Community Feedback Mechanism

Community members and stakeholders are aware of established complaint mechanisms in GOAL projects and their right to be safe from abuse and exploitation in GOAL’s programmes.

GOAL will:

- Work with both children and adults in the community to help them recognize inappropriate conduct by GOAL Members, and to develop safe and context-based community response mechanisms by which children and adults can report general suggestions and any serious incidents of misconduct by GOAL Members.
- Provide information on how to report sexual exploitation, abuse and harassment, or other breaches of our Code of Conduct by GOAL Members. This will be done through the dissemination of information education and communication materials (IEC) and by conducting community consultations and briefings.

¹⁰ **Survivor-centred approach:** As part of this approach, the organisation gives the complainant/survivor control over the decision-making processes after the incident, provides internal support and arranges for support from relevant professional bodies. Under certain circumstances, however, the organisation may reclaim decision-making authority from the complainant/survivor.

Community members and stakeholders who have an SEAH complaint or concern relating to GOAL, or its partners are encouraged to report it to one or more of the following channels:

- They may utilize GOAL’s SpeakUp mechanism.
- They may report it to a GOAL or partner staff member, should they feel comfortable doing so. GOAL staff members are required to refer the issue (as outlined in Section C-Reporting).
- They may contact GOAL’s Community Feedback Mechanism (CFM) locally through any of the various channels available. The CFM Teams will also refer the issue through the appropriate channels within GOAL.

7. Non-compliance

Any concern regarding SEAH or suspicion of SEAH or a breach of the GOAL PSEAH Policy, at any level is treated with the utmost seriousness by GOAL. GOAL will apply appropriate disciplinary measures to staff found in breach of the policy. GOAL appreciates that cases of sexual abuse, exploitation or harassment can be exceptionally difficult to discover and/or prove. Complainants of sexual abuse, exploitation and harassment often face enormous social and cultural barriers to reporting any abuse or exploitation. In many cases alleged perpetrators may wield power or position over their victims, and/ or live-in close proximity to them.

GOAL recognises that these factors may interfere with any investigation into cases of sexual abuse, exploitation or harassment. GOAL also recognises the significant damage that can be caused by malicious or unfounded accusations and will endeavor to provide protection for staff who may be wrongly accused.

8. Related Policies and Procedures

The GOAL PSEAH Policy is linked to and must be read in conjunction with:

- GOAL Code of Conduct
- GOAL Child and Adult Safeguarding Policy
- GOAL Child Protection Policy
- GOAL Gender Equality Policy and Strategy
- GOAL Risk Management Policy
- GOAL Employee Handbook
- GOAL Dignity at Work Policy
- GOAL Whistleblowing Policy
- GOAL Social-Media and Online Policy

A list of all GOAL’s active policies can be found on [the Policies](#) page on GOAL’s intranet.

Support Toolkit Associated with the implementation of this policy:

Annex 1: Flow Chart of Reporting SEAH Cases

Annex 2: Safeguarding Incident and Response Protocols

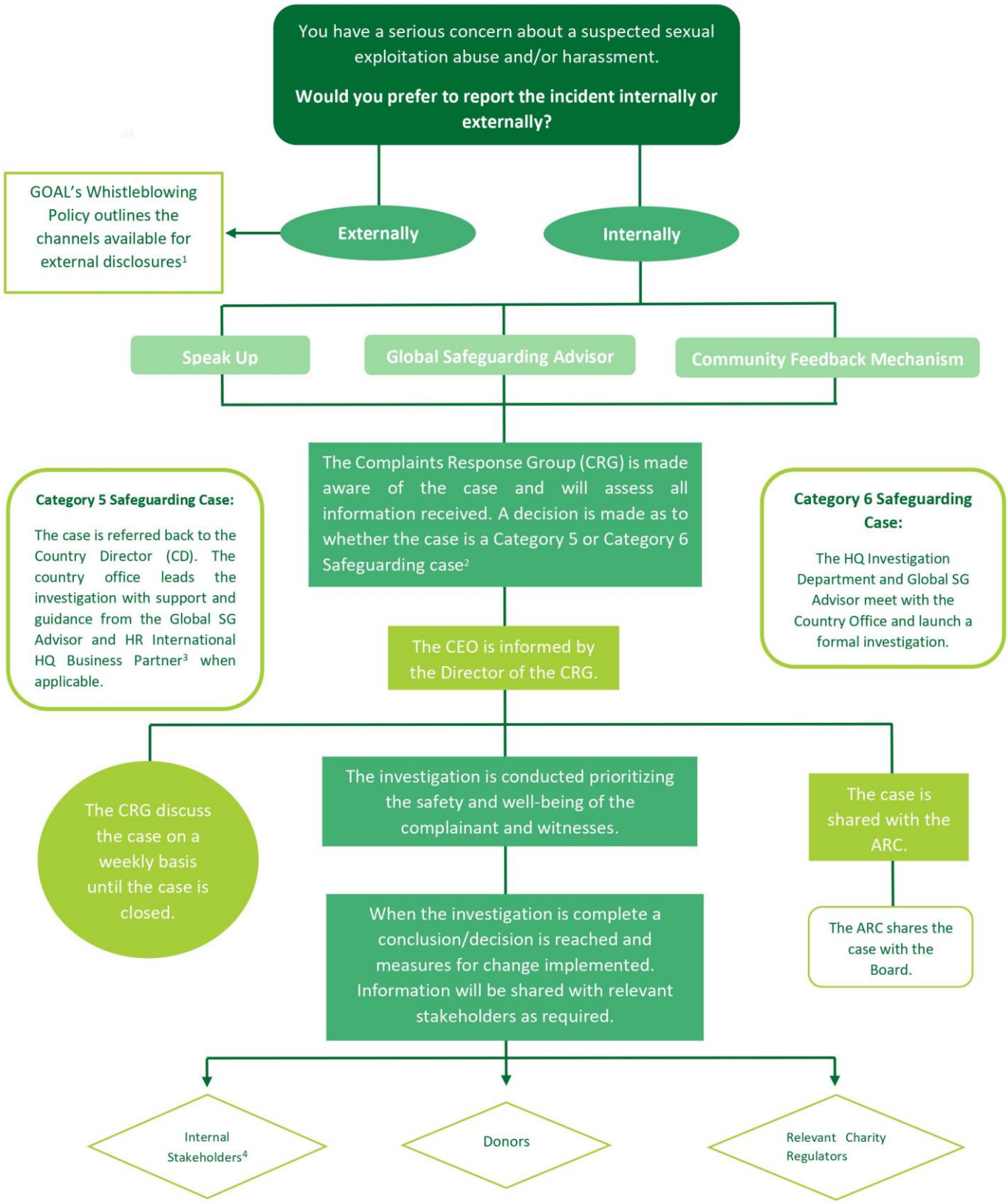
Annex 3: Names and Contact Details for Reporting and Responding to SEAH concerns

Annex 4: Serious Wrongdoing Report Form

Annex 5: The Code of Conduct

Annex 6: Sign Form

Annex 1: Flowchart of reporting Sensitive Cases



¹ GOAL's Whistleblowing Policy, Annex 1: Progressing concerns about a suspected wrongdoing
² In accordance with our Safeguarding Incidents and Response Protocols outlined in the SoP Head Office Complaints Procedure.
³ Refer to the Dignity at Work Policy, which outlines the required investigation process
⁴ Information shared as outlined in our Safeguarding Incident and Response Protocols.

Annex 2: Safeguarding Incident and Response Protocols

Effective Date:	December 2021
Review Date:	December 2023

GOAL Safeguarding Incident and Response Protocols

1: Responding to Safeguarding Incidents

GOAL Members are required to investigate and respond to reports of child or adult abuse of participants of GOAL programmes in ways in which are consistent with local law. GOAL uses two levels of Safeguarding Incidents to determine GOAL's response, which is based on the seriousness of the incident and GOAL's role. The categorisation of incidents aligns to GOAL's Complaints Feedback Mechanism.

Safeguarding Category Definitions

Category 5 - Safeguarding	An issue, complaint, or disclosure relating to any incident of verbal abuse or one-off/first time harassment (including online abuse) relating to GOAL staff, programme, or its partners. Any form of abuse or exploitation within GOAL's area of operation but unrelated to GOAL, GOAL staff, or GOAL partners, that GOAL becomes aware of.
Category 6 - Safeguarding	An issue, complaint, or disclosure relating to any incident of physical abuse, sexual abuse, child abuse, sexual exploitation, child exploitation, or repeated harassment concerning GOAL, GOAL staff, or GOAL partners.

2: Response Protocols

All safeguarding reports must be sent to SpeakUp (Complaints Response Group) and the Global Safeguarding Advisor. Upon receipt they are categorized as either Category 5 Safeguarding or Category 6 Safeguarding cases.

Depending on the seriousness of an allegation, urgent action may be required before an investigation is launched, such as:

- providing urgent medical attention.
- removing a health and safety hazard.
- suspending a person from duty.
- reducing a person's access to programmes to prevent a serious incident.

All such incidents are tracked in the Safeguarding Case Management System.

Category 5 - Safeguarding case

For Category 5 Safeguarding cases, the case will be referred back to, and managed by, the Country Director (CD) for local investigation. The country office will lead this investigation with support and guidance from the Global Safeguarding Advisor. When required the HR International HQ Business Partner will be informed of the case and may refer to the Dignity at Work Policy, section 3.2 "Steps in resolving complaints under the Dignity at Work Policy," if applicable.

Category 5 Safeguarding cases are not shared with the donor.

Category 6 - Safeguarding case

For Category 6 safeguarding cases, the Global Safeguarding Advisor will work with the Director of Investigations in supporting the country offices in the course of the investigation, including review of the Investigation plan.

On occasion it may be necessary for HQ Investigation Department to investigate the case directly. All other Category 6 Safeguarding cases will be immediately referred back to the Country Director, who should commence an investigation with oversight, and assistance, from the HQ Investigation Department and the Global Safeguarding Advisor.

The Director of Investigations and the Global Safeguarding Advisor will oversee the reporting of issues to the appropriate authorities such as law enforcement, relevant donors and charity regulators.

Category 6 Safeguarding cases will be shared with the relevant donor.

The Investigation Department/CRG may share a case with the Legal Counsel, Head of HR, Director of Programmes, Regional Director, or any other senior staff member, at their discretion, as required and on a case-by-case basis.

3: Reporting and Responding

Table 1: Responsibilities of Reporting and Responding

	WHO	WHEN	TO WHOM	INFORMATION REQUIRED	WHO INFORMS THEM	HOW ARE THEY INFORMED
WHO IS RESPONSIBLE FOR REPORTING?	Any GOAL Member	Within 24 hours	SpeakUp Safecall Global Safeguarding Advisor Complaints Feedback Mechanism (CFM) Country Director	All details	Complainant / Whistleblower	GOAL's Internal/External reporting channels
WHO IS RESPONSIBLE FOR RESPONDING?	Director of Investigations Or County Director	Within 36 hours	Complainant / Whistleblower	Acknowledgement of receipt of report		Email Phone call
WHO NEEDS TO BE CONSULTED?	Global Safeguarding Advisor	Within 24 hours		All details	Investigation Department or local Investigation team	Email Phone call
	Global Security Advisor (If needed following a risk assessment)	As needed		Relevant details	Investigation Department or local Investigation team	Email Phone call
	Legal Counsel	As needed		Relevant details	Investigation Department or Country Director	Email Phone call
WHO NEEDS TO BE INFORMED? <i>*Applies to Category 6</i>	Regional Director (RD)	Within 24 hours		High level information only, this includes: - Country office -Brief description of allegation. -Anonymised information	Country Director	Email Phone Call

Safeguarding cases only	HR Director	As needed		<p>High level information only, this includes:</p> <ul style="list-style-type: none"> - Country office -Brief description of allegation. -Anonymised information <p><i>*however, if the allegation includes an International staff member or SMT in country then all details to be shared with HR Director.</i></p>	Investigations Director	Email Phone Call
	Director of International Programs (DoIP)	As needed		<p>High level information only, this includes:</p> <ul style="list-style-type: none"> - Country office -Brief description of allegation. -Anonymised information 	Investigations Director	Email Phone Call
	CEO	Within 24 hours		<p>High level information only, this includes:</p> <ul style="list-style-type: none"> - Country office -Brief description of allegation. -Anonymised information 	Director of CRG	Email Phone Call

Annex 3: Names and Contact Details for Reporting and Responding to Sexual Exploitation, Abuse and Harassment concerns

GOAL Ireland Contacts		
Person	Contact	Area & Programme
<p>Name: Mandy Yamanis</p> <p>Designation: Global Safeguarding Advisor</p>	<p>+357-99-465246</p> <p>Carnegie House, Library Road, Dun Laoghaire, Co. Dublin, Ireland</p> <p>myamanis@goal.ie</p>	Global
<p>Name: Mary van Lieshout</p> <p>Designation: Head of Complaint Response Group</p>	<p>+353 1 280 9779</p> <p>Carnegie House, Library Road, Dun Laoghaire, Co. Dublin, Ireland</p> <p>mvanlieshout@goal.ie</p>	Global
<p>Name: Alphonsus Martyn</p> <p>Designation: Director of Investigations</p>	<p>+353 1 280 9779</p> <p>Carnegie House, Library Road, Dun Laoghaire, Co. Dublin, Ireland</p> <p>amartyn@goal.ie</p>	Global

Annex 4: Serious Wrongdoing Report Form

When dealing with any complaint of a Category 6 -Safeguarding* nature; always treat the case with the utmost confidentiality. To be submitted to the Complaints Response Group (SpeakUp@goal.ie), and the Global Safeguarding Advisor (myamanis@goal.ie) within 24 hours of becoming aware of an incident or suspicion of safeguarding wrongdoing. Acknowledgement will come from the Complaints Response Director, after which the Director of Investigations and the Global Safeguarding Advisor will consult and communicate regarding further actions.

a. Name, title and job location of person submitting this report:

b. Date this report was submitted:

* **Category 6 - Safeguarding** – An issue, complaint, or disclosure relating to any incident of physical abuse, sexual abuse, child abuse, sexual exploitation, child exploitation, or repeated harassment concerning GOAL, GOAL staff, or GOAL partners.



DETAILS OF THE SAFEGUARDING WRONGDOING

1. Name of person who first received the safeguarding wrongdoing report.

2. Is this being reported within 24 hours of being informed? If not, explain why.

3. On what date has the alleged wrongdoing occurred?

4. Where has this alleged wrongdoing occurred?

5. Preliminary details of the safeguarding wrongdoing/s:

6. Please provide the following details

Complainant/Survivor Details

Name(s):	
-----------------	--

Gender(s):	
Age(s):	
GOAL Employee('s) (Yes/No):	
Role(s) and/or Occupation(s):	
Current Location(s):	
Has emergency medical intervention been provided? (Please give details – Who, What, When)	
Relationship to the Alleged Subject of Complaint?	

Alleged Subject of Complaint(s) (SOC) Details

Name(s):	
Gender(s):	
Age(s):	
GOAL Employee('s) (Yes/No):	
Role(s) and/or Occupation(s):	
Current Location(s):	

7. Details of all parties who are aware of the safeguarding wrongdoing/s, suspected or otherwise to date.

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8. Copies of supporting documentation available at initial reporting stage.

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9. Confirm whether any actions have been taken.

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10. Detail any security implications.

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11. Proposed actions to be taken, for approval by the Director of Investigations and the

Global Safeguarding Advisor.

12. In cases involving laptops, mobile phones or other data storage devices please consider any data protection implications?

13. Do circumstances exist where this complaint should be reported to Law Enforcement?

14. What is the name of the relevant Donor?

15. Has this incident been reported to the relevant Donor?

16. What GOAL programme does this alleged wrongdoing relate? (e.g. WASH, CVA, Food Security etc.)

17. Please include any other information you deem relevant to the case.

Note: If you do not receive direction from the Director of Investigations and /or the Global Safeguarding Advisor within 36 hours you should proceed with the measures you deem necessary to prevent further harm.

Timeline for anticipated acknowledgment / response:

After you have submitted this report to SpeakUp@goal.ie you may anticipate an acknowledgement e-mail from the Complaints Response Group within 24 hours. This is to recognise receipt of your submission and will inform you that discussions will take place at Head Office regarding this case. Within 36 hours of your submitting this report, the Director of Investigations will make contact with you with more considerable and instructive feedback. If the Director of Investigations feels that an investigation is necessary by your country team; they will indicate so and ask you to complete an Investigation Plan. The Director of Investigations and the Global Safeguarding Advisor will also be available to offer advice on all aspects of the investigation.

Annex 5: The Code of Conduct

I will promote all fundamental human rights.

I will not discriminate, directly or indirectly, on the grounds of gender; marital status; family status; sexual orientation; religion; age; disability; race; political affiliation; social status; or membership of an ethnic community.

I will treat every person with respect, dignity and courtesy. I will act in a supportive, professional manner towards all those I work with. I will contribute towards building a harmonious workplace.

I will obey international law and the laws of the country where I am based, and respect local customs. I will always apply the highest and most stringent standard.

I will not allow my personal views to affect GOAL's status as a non-religious, non-political organisation.

I will not commit any act, or consent to any act being committed, that could cause physical or psychological harm or suffering to any person. I will be particularly conscious of the vulnerabilities of women and children in this regard. I understand that sexual activity with children (persons under the age of 18), which also includes child marriage, is strictly prohibited. This applies regardless of local laws and customs regarding age of majority and/or consent. Mistaking the age of a child will not form any part of a defence.

I will not abuse any real or perceived power that accrues from my position in GOAL.

I will not seek to influence humanitarian assistance, give preferential treatment, offer employment or promotion, or give or receive money in order to obtain or gain a benefit for myself or others, receive gifts or advantages or sexual favours.

I will not enter into any sexual activity which may be perceived as an exploitation of an unequal power dynamic. I understand that sexual relationships between any GOAL Member and program participants, or any other behaviour that is humiliating, degrading or exploitative, or behaviour that undermines the credibility and integrity of humanitarian aid work is prohibited.

I will not excuse or ignore or participate in corrupt, fraudulent, exploitative, or unethical activities. This includes, but is not limited to the trafficking of people, participating in any armed, political or religious conflict, dealing in illegal drugs, gems or arms or using the services of a sex worker.

I will uphold the highest standards of integrity, honesty and transparency. I will strive for the most ethical, effective and efficient use of GOAL resources.

I will disclose any and all interests, whether (a) personal, financial, business, political or family interest(s), and any outside employment/engagement that may impact my responsibilities and obligations to GOAL either in fact or appearance in accordance with GOAL's Conflict of Interest Policy.

I will behave in such a manner as to avoid any unnecessary personal risks that may impact on the health, safety and welfare of myself and others. This includes partner organisations and beneficiaries.

I will not be under the influence of alcohol or drugs, which include illegal drugs and misused prescription medication, while engaged in GOAL duties. I will not work while impaired by a lawful prescription medication or over-the-counter drugs. I will be fit to carry out my role in GOAL and fulfil my responsibilities.

I will exercise due care in all matters of official business and not divulge any confidential information about beneficiaries, staff members, or other work-related matters.

I will not speak to the media on behalf of GOAL, or in respect of GOAL programmes or the situation in a country where GOAL is based, except where I am given explicit written authorisation to do so by my Line Manager or Country Director.

I will not post social media that bring GOAL into disrepute, or cause offence to a host country and/or any section of its community, except in accordance with GOAL Social Media Policy.

I will always uphold GOAL's organisational values of Humanitarianism, Integrity, Partnership, Respect and Courage described in Annex 1.

I will report any concerns of suspected wrong-doing by any staff/representative of a Member under GOAL's Whistleblowing Policy, either internally emailing speakup@goal.ie, or through the externally managed hotline, Safecall: www.safecall.co.uk/report / goal@safecall.co.uk.

The Code should be read in conjunction with the following associated GOAL policies:

- Whistleblowing Policy
- Child and Adult Safeguarding Policy:
- Child Protection Policy
- Protection from Sexual Exploitation and Abuse Policy
- Anti-Fraud Policy
- Conflict of Interest Policy
- Social Media Policy
- Dignity at Work Policy

Annex 6: Sign Form

GOAL

I acknowledge the receipt of the Protection from Sexual Exploitation, Abuse and Harassment (PSEAH) Policy (Version 2).

I have read the policy, I understand it and I accept the contents therein as part of my conditions of employment with GOAL.

Name: _____

Signature: _____

Date: _____