



SAFEGUARDING FRAMEWORK

2026

NON-PROFIT ORGANISATION

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1. Purpose

NAMBI FOUNDATION is a non-profit organisation committed to supporting people and communities in a responsible, respectful and ethical way.

Safeguarding is a fundamental part of that responsibility.

This Policy explains how NAMBI FOUNDATION works to prevent harm, abuse, exploitation, neglect and harassment connected with its activities and how concerns should be reported and addressed.

The purpose of this Policy is to help ensure that children, adults, community members, programme participants, volunteers, employees, partners and anyone else who comes into contact with NAMBI FOUNDATION can do so in an environment that respects their safety, dignity and rights.

Safeguarding is not limited to responding after something has gone wrong. It also means identifying risks in advance, designing safer programmes, recruiting responsibly, maintaining appropriate professional boundaries, listening to communities and creating reliable ways for people to raise concerns.

2. Our Safeguarding Commitment

NAMBI FOUNDATION believes that every person has the right to live free from abuse, exploitation, violence, harassment and degrading treatment.

No person should experience harm because they participated in, received support from, worked for or otherwise came into contact with NAMBI FOUNDATION.

We recognise that some people may face greater safeguarding risks because of age, disability, poverty, displacement, illness, social circumstances, unequal power relationships or other forms of vulnerability.

Children require particular protection.

NAMBI FOUNDATION therefore commits to taking reasonable and proportionate steps to prevent harm, identify safeguarding risks, respond to concerns and continuously improve the safety of its programmes and activities.

3. Safeguarding Principles

Our safeguarding approach is guided by the following principles:

- Human dignity
- Every person must be treated with respect regardless of their circumstances.
- Do no harm

Activities should be designed and delivered in ways that reduce the risk of causing physical, emotional, sexual, financial or social harm.

Safety first

The wellbeing and immediate safety of a person affected by a safeguarding concern should be considered throughout the response.

Respect and non-discrimination

Safeguarding protection applies to everyone without unfair distinction.

Accountability

People who work with or represent NAMBI FOUNDATION are responsible for their behaviour and for complying with safeguarding requirements.

Participation

Where appropriate, communities and programme participants should be involved in identifying risks and improving the safety of activities that affect them.

Confidentiality

Safeguarding information should be handled carefully and shared only with people who have a legitimate reason to receive it.

Fairness

Safeguarding concerns should be considered seriously, objectively and without assuming guilt before the relevant facts have been established.

Survivor-centred response

Where someone has experienced harm, their dignity, safety, choices and wellbeing should guide the response as far as possible and consistent with legal and safeguarding obligations.

4. Who This Policy Applies To

This Policy applies to people acting for or on behalf of NAMBI FOUNDATION, including:

- employees
- management
- board or governing body members
- volunteers
- interns
- consultants
- contractors
- temporary personnel
- representatives and ambassadors
- individuals participating in Foundation activities in an official capacity; and

other persons who may have contact with communities or programme participants because of their relationship with NAMBI FOUNDATION.

Relevant safeguarding expectations also apply to partner organisations, service providers and suppliers whose activities involve direct contact with people supported through NAMBI FOUNDATION programmes.

This Policy applies during Foundation activities and in other situations where a person's conduct is directly connected with their role, responsibilities or representation of NAMBI FOUNDATION.

5. Partners and Associated Organisations

NAMBI FOUNDATION expects organisations working with us to maintain safeguarding standards appropriate to the nature of their activities.

Where a partner already has its own safeguarding policies and procedures, NAMBI FOUNDATION may recognise those policies when they provide appropriate protection and are consistent with the fundamental principles contained in this Policy.

Partners should have appropriate arrangements for preventing, reporting and responding to safeguarding concerns.

Where necessary and practical, NAMBI FOUNDATION may work with partners to strengthen safeguarding practices, reporting procedures or staff awareness.

Serious safeguarding failures by a partner may result in corrective action, suspension of activities, withdrawal of support or termination of the relationship.

6. Meaning of Safeguarding

For NAMBI FOUNDATION, safeguarding means the measures taken to protect people from harm that may arise through contact with our organisation, representatives, programmes, projects or activities.

Safeguarding includes preventing and responding to:

- physical abuse
- sexual abuse
- sexual exploitation
- sexual harassment
- emotional or psychological abuse
- neglect
- bullying
- harassment
- intimidation
- discrimination
- trafficking
- exploitation
- abuse of authority
- harmful treatment of children
- financial exploitation connected with programme relationships; and
- other behaviour that threatens a person's safety, dignity or wellbeing.

7. Protection and Safeguarding

Safeguarding primarily concerns harm that could arise through contact with NAMBI FOUNDATION, its representatives, partners or programmes.

Protection may also involve risks that exist in the wider community and are not caused by NAMBI FOUNDATION.

When our team becomes aware that someone may be at serious risk from another person or situation outside the Foundation, we should respond responsibly within our role and, where appropriate, refer the matter to suitable protection services or authorities.

8. Standards of Behaviour

Everyone representing NAMBI FOUNDATION must behave in a way that protects the dignity and safety of others.

They must:

- treat people respectfully
- maintain appropriate professional boundaries
- avoid actions that could cause unnecessary harm
- take safeguarding concerns seriously
- follow safeguarding procedures

- report serious concerns through appropriate channels
- respect confidentiality
- cooperate with legitimate safeguarding inquiries; and
- avoid using positions of trust or authority for personal advantage.

9. Unacceptable Behaviour

No person representing NAMBI FOUNDATION may:

- physically abuse another person
- sexually abuse or exploit another person
- engage in sexual harassment
- threaten or intimidate someone
- deliberately humiliate or degrade another person
- use violence except where reasonably necessary for immediate self-defence or protection from serious harm
- engage in trafficking or exploitative labour practices
- exchange assistance for sexual activity or personal favours
- use access to Foundation resources to manipulate another person
- harass or bully colleagues, volunteers, programme participants or community members
- use discriminatory or degrading language
- retaliate against someone who raises a safeguarding concern; or
- deliberately conceal serious safeguarding misconduct.

10. Abuse of Power

Humanitarian, charitable and community activities can create unequal relationships between people providing support and people receiving it.

Everyone connected with NAMBI FOUNDATION must recognise this imbalance and avoid using it for personal benefit.

A person must never use their position to pressure another person into:

- a sexual relationship
- providing sexual favours
- providing money
- giving gifts
- providing unpaid services
- supporting personal business interests
- providing political or religious support
- entering an unwanted personal relationship; or
- doing anything they would not freely choose to do.

11. Sexual Exploitation and Abuse

NAMBI FOUNDATION does not tolerate sexual exploitation or sexual abuse connected with its work.

Sexual abuse includes sexual contact, conduct or intrusion that occurs through force, coercion, manipulation, intimidation or circumstances in which meaningful consent cannot be given.

Sexual exploitation includes taking advantage of a person's vulnerability, dependence, trust or unequal position for sexual purposes.

No person representing NAMBI FOUNDATION may offer or withhold money, employment, assistance, goods, services, opportunities or other benefits in exchange for sexual activity or sexual favours.

Assistance belonging to programme participants must never be treated as something for which sexual or personal favours are expected.

12. Sexual Harassment

Sexual harassment includes unwanted behaviour of a sexual nature that causes discomfort, humiliation, fear, intimidation or offence.

It may be verbal, physical, written, visual or digital.

Examples may include:

- unwanted sexual comments
- sexual jokes directed at another person
- unwanted touching
- repeated requests for romantic or sexual contact after refusal
- sexual messages
- displaying sexually explicit material in inappropriate circumstances
- sexual gestures
- unwanted sexual attention
- pressure for sexual activity; or
- sexually degrading remarks.
- A single serious incident may constitute sexual harassment.

13. Relationships With Programme Participants

People receiving support through NAMBI FOUNDATION programmes may be in a position of dependency or reduced power.

Personnel must therefore exercise particular care regarding intimate or sexual relationships with programme participants.

Relationships involving a significant imbalance of power may create risks of exploitation, favouritism, coercion or perceived coercion.

NAMBI FOUNDATION personnel must not initiate or maintain relationships that misuse a programme relationship or position of authority.

Any situation that creates a safeguarding concern or conflict of interest should be disclosed through the appropriate internal process.

14. Child Safeguarding

NAMBI FOUNDATION considers every person under the age of 18 to be a child for the purposes of this Policy.

Children have the right to be protected from violence, abuse, exploitation, neglect and harmful treatment.

Anyone working with or around children through NAMBI FOUNDATION must act with additional care because children may be less able to recognise unsafe behaviour, protect themselves or report what has happened.

The best interests, dignity and safety of the child should be central to decisions affecting them.

15. Behaviour Around Children

People representing NAMBI FOUNDATION must:

- treat children with respect
- use age-appropriate language
- listen to children when they express concerns
- avoid humiliating or frightening behaviour
- maintain appropriate boundaries
- avoid unnecessary private or isolated situations with a child
- where practical, ensure another responsible adult is present during activities involving children
- follow appropriate consent procedures
- respect children's privacy
- avoid favouritism; and
- report concerns about a child's safety.

16. Prohibited Conduct Involving Children

No person representing NAMBI FOUNDATION may:

- engage in sexual activity with anyone under 18
- sexually abuse or exploit a child
- request sexual images from a child
- create, access, possess or distribute child sexual abuse material
- touch a child in a sexual or inappropriate way
- use physical punishment
- deliberately humiliate, shame or degrade a child
- emotionally abuse a child
- neglect a child placed under their responsibility
- encourage a child to participate in sexually inappropriate behaviour
- engage a child in exploitative labour
- traffic a child
- offer assistance in exchange for sexual or personal favours
- invite an unaccompanied child into an isolated or private location without a legitimate safeguarding reason
- sleep in inappropriate proximity to an unrelated child without necessary safeguards; or

develop a relationship with a child that could reasonably be considered exploitative, abusive or inappropriate.

Believing that a child was older than 18 does not justify sexual activity with a minor.

17. Children With Additional Support Needs

Children with disabilities or other support needs may sometimes require assistance with mobility, clothing, hygiene or other personal activities.

Where such assistance is genuinely necessary, it should be provided respectfully and only to the extent required.

Whenever appropriate, the child should be told what is happening, their preferences should be respected and the involvement or understanding of a parent, guardian or responsible professional should be sought.

Unnecessary physical contact must be avoided.

18. Children's Participation

Children should not automatically be treated only as recipients of support.

Where appropriate to their age and development, children should have opportunities to express their views about activities that affect them.

Their participation must be voluntary, safe, respectful and appropriate to their abilities.

Children must not be pressured to share painful experiences publicly or participate in activities that could expose them to embarrassment, retaliation or unnecessary distress.

19. Collecting Information From Children

Research, assessments, interviews, monitoring and other activities involving children must be planned carefully.

Personnel should:

- use child-appropriate communication
- collect only information reasonably necessary for the activity
- protect confidentiality
- obtain appropriate consent or assent
- avoid unnecessary questions about traumatic experiences
- be prepared to stop an interview if a child becomes distressed; and
- know how to refer a child for appropriate support when serious concerns are identified.

20. Photographs, Video and Stories Involving Children

Images and stories involving children must be collected and used responsibly.

NAMBI FOUNDATION should ensure that:

- the purpose of the photograph, video or story is explained
- appropriate permission is obtained
- children are portrayed respectfully
- images do not sexualise or degrade children
- personal information is not unnecessarily disclosed
- location details are not published when doing so could create risk
- children are appropriately dressed for the context
- materials are stored securely; and
- publication does not expose the child to foreseeable harm.

- Fundraising, publicity or social media objectives must never take priority over a child's safety and dignity.

21. Safeguarding Adults at Risk

Adults may also face circumstances that increase their vulnerability to abuse or exploitation.

These circumstances may include disability, illness, age, displacement, poverty, dependency, isolation or unequal access to resources.

Personnel must avoid assumptions about a person's capacity and should respect the individual's choices wherever possible.

Additional safeguards should be introduced when circumstances create a heightened risk of exploitation or harm.

22. Safer Recruitment

NAMBI FOUNDATION seeks to reduce safeguarding risk before a person begins working with the Foundation.

Depending on the role, recruitment measures may include:

- clear safeguarding expectations in job or volunteer descriptions
- questions about safeguarding during interviews
- identity verification
- reference checks
- review of previous employment or volunteering history
- appropriate criminal record or background checks where lawful and relevant
- declarations regarding previous misconduct
- assessment of unexplained gaps in work history when relevant; and
- confirmation that the candidate understands and accepts NAMBI FOUNDATION safeguarding standards.
- The level of screening should reflect the responsibilities and safeguarding risk of the position.

23. Induction and Training

People whose roles involve safeguarding responsibilities should receive appropriate information and training.

NAMBI FOUNDATION should ensure that relevant personnel understand:

- this Safeguarding Policy
- the Code of Conduct
- child safeguarding requirements
- prevention of sexual exploitation and abuse
- reporting procedures
- confidentiality requirements
- their individual responsibilities; and
- where to obtain advice.
- Training should be refreshed when necessary and adapted to the type of work being carried out.

24. Safeguarding in Programme Design

Safeguarding must be considered when projects and activities are planned, not only after an incident occurs.

Programme teams should consider questions such as:

- Who could be exposed to harm through this activity?
- Are children or adults at heightened risk involved?
- Could access to assistance give one person excessive power over another?
- Are activities taking place in isolated locations?
- Could transport arrangements create safeguarding concerns?
- Could photographs or data expose participants to risk?
- Are staff working alone with children?
- Can people safely report concerns?
- Are there risks of sexual exploitation or abuse?
- Could beneficiary selection create opportunities for favouritism or coercion?
- Appropriate measures should be introduced to reduce identified risks.

25. Safeguarding Risk Assessment

NAMBI FOUNDATION should conduct proportionate safeguarding risk assessments for programmes and activities where significant safeguarding risks may arise.

The assessment should consider:

- who may be at risk
- the nature and likelihood of possible harm
- the seriousness of potential consequences
- existing safeguards
- additional actions required; and
- who is responsible for implementing those actions.

Activities that create unacceptable safeguarding risks should not proceed unless those risks can be reduced to an appropriate level.

26. Fair Distribution of Assistance

Selection of programme participants and distribution of support must be carried out transparently and according to reasonable programme criteria.

Where possible, decisions should not depend entirely on a single individual.

Personnel must not use control over assistance to create personal relationships, demand favours or pressure people.

Communities should receive clear information about eligibility and available complaint procedures where appropriate.

27. Reporting Safeguarding Concerns

NAMBI FOUNDATION encourages people to report safeguarding concerns as early as possible.

Reports may relate to:

- suspected abuse
- sexual exploitation
- sexual harassment
- child safeguarding concerns
- violence
- bullying
- intimidation
- discrimination
- trafficking
- abuse of authority
- retaliation
- serious breaches of professional boundaries; or
- other conduct that may place someone at risk.
- A person does not need to investigate a concern before reporting it.
- Reasonable suspicion, an allegation, a disclosure or direct observation may be sufficient to raise a concern.

28. Duty to Report

Employees, volunteers and other representatives who become aware of a serious safeguarding concern connected with NAMBI FOUNDATION should report it through the appropriate safeguarding channel.

Serious concerns should not be intentionally concealed.

When someone discloses possible abuse, the person receiving the disclosure should listen carefully, avoid making promises they cannot keep and pass the information to the appropriate person without unnecessarily sharing it with others.

29. Reporting Channels

NAMBI FOUNDATION should maintain reporting options that are appropriate to its size, structure and programmes.

These may include:

- a designated safeguarding contact
- a line manager
- a senior manager
- a confidential email address
- a telephone contact
- a community feedback mechanism; or
- another approved reporting channel.

People should be provided with an alternative reporting route when the normal contact person is involved in the concern or when reporting to that person would not feel safe.

Contact information for active reporting channels should be communicated separately and kept current.

30. Community Reporting Mechanisms

People participating in NAMBI FOUNDATION programmes should have reasonable opportunities to provide feedback and raise concerns.

Reporting mechanisms should, where possible, be:

- safe
- confidential
- easy to understand
- accessible
- appropriate to the local context
- available to people with different communication needs; and
- suitable for children where children participate in Foundation activities.

Communities should know that raising a complaint will not automatically cause them to lose access to legitimate assistance.

31. Anonymous Reports

NAMBI FOUNDATION may consider anonymous safeguarding reports.

Anonymous reports can sometimes be more difficult to investigate because further information may not be available.

However, an allegation should not be ignored only because the person reporting it has chosen not to identify themselves.

The seriousness, credibility, available information and potential risk should determine the appropriate response.

32. Confidentiality

Safeguarding information is sensitive and should be shared only with people who require it to protect individuals, manage the concern, investigate appropriately or meet legal obligations.

Information should not be discussed casually with colleagues or people outside the case management process.

Records should be stored securely.

Complete confidentiality cannot always be guaranteed because information may need to be shared for safeguarding, legal or investigative reasons.

Where possible, affected individuals should be informed about how their information may be used.

33. Protection Against Retaliation

NAMBI FOUNDATION does not accept retaliation against a person who raises a genuine safeguarding concern, provides information or participates in an investigation in good faith.

Retaliation may include:

- threats
- intimidation
- bullying
- loss of legitimate opportunities
- deliberate exclusion
- unjustified disciplinary action
- interference with programme assistance; or

- other harmful treatment intended to punish someone for speaking up.
- Confirmed retaliation may itself result in disciplinary or contractual consequences.

34. Good Faith Reports

A safeguarding concern raised honestly should not result in punishment merely because an investigation does not confirm the allegation.

Safeguarding systems depend on people being able to speak when they genuinely believe something may be wrong.

However, deliberately inventing accusations, knowingly providing false information or maliciously using reporting procedures to harm another person may constitute misconduct.

35. Immediate Response to a Concern

When a safeguarding concern is received, the first priorities should include:

- identifying immediate safety risks
- considering urgent medical or psychosocial needs
- protecting children or adults at serious risk
- preserving relevant information
- maintaining appropriate confidentiality
- preventing retaliation
- determining whether specialist safeguarding advice is required; and
- deciding whether the matter requires further inquiry or formal investigation.
- Emergency safety concerns should be addressed without unnecessary delay.

36. Safeguarding Investigations

Safeguarding allegations should be handled sensitively, fairly and proportionately.

Where an investigation is necessary, NAMBI FOUNDATION should aim to ensure that it is:

- impartial
- confidential
- appropriately documented
- conducted by a suitable person
- completed without unnecessary delay
- respectful toward all involved; and
- focused on establishing relevant facts.

The person who is the subject of the allegation should normally be informed of the substance of the concern and given an appropriate opportunity to respond before final disciplinary conclusions are reached, unless temporary restrictions are necessary to protect people or preserve the investigation.

37. Temporary Protective Measures

Where an allegation creates a significant safeguarding risk, NAMBI FOUNDATION may introduce temporary measures while the matter is being considered.

These may include:

- changing duties

- restricting contact with programme participants
- temporary removal from certain activities
- increased supervision
- temporary suspension; or
- other proportionate measures.
- Such actions are precautionary and do not by themselves establish that misconduct occurred.

38. Fair Process

NAMBI FOUNDATION aims to protect both people raising safeguarding concerns and people who are the subject of allegations.

A person accused of misconduct should be treated with dignity and should not automatically be considered responsible before the relevant process has been completed.

Investigations should be based on available evidence and conducted as objectively as possible.

Deliberate interference with an investigation, destruction of relevant evidence, intimidation of witnesses or serious breaches of confidentiality may result in disciplinary action.

39. Referrals to Authorities

Some safeguarding concerns may involve possible criminal conduct or legal reporting obligations.

NAMBI FOUNDATION will consider applicable law, immediate safety, the nature of the allegation and the interests of the affected person when determining whether a matter should be referred to police, child protection services, regulators or other competent authorities.

Where possible and legally appropriate, the wishes and safety of the survivor should be considered before information is shared externally.

Nothing in this Policy is intended to prevent mandatory reporting required by applicable law.

40. Support for Survivors

Where appropriate and resources allow, NAMBI FOUNDATION may help a person affected by safeguarding misconduct access relevant support.

Depending on the circumstances, support may include referral to:

- medical care
- psychosocial services
- child protection services
- legal assistance
- specialist sexual violence services
- safe accommodation; or
- other appropriate services.
- The survivor should be treated respectfully and involved in decisions affecting them wherever possible.
- Support should not depend solely on whether an allegation results in disciplinary action.

41. Safeguarding Records

Safeguarding concerns, decisions and actions should be recorded appropriately.

Records should be accurate, factual and stored securely.

Access should be limited to authorised people.

Records should distinguish, where possible, between:

- what was directly observed
- what was reported by another person
- what has been confirmed
- what remains uncertain; and
- what decisions were made.

Safeguarding records should be retained according to applicable legal requirements and NAMBI FOUNDATION procedures.

42. Designated Safeguarding Responsibility

NAMBI FOUNDATION should identify an appropriate person or function responsible for coordinating safeguarding.

Depending on the Foundation's structure, responsibilities may include:

- providing safeguarding guidance
- receiving serious concerns
- supporting risk assessments
- maintaining reporting procedures
- coordinating referrals
- supporting safeguarding training
- maintaining appropriate records
- monitoring safeguarding practices; and
- supporting improvements after incidents.

Responsibility for safeguarding does not belong only to the designated safeguarding person. Everyone representing NAMBI FOUNDATION shares responsibility for creating a safe environment.

43. Responsibility of Management

NAMBI FOUNDATION leadership and managers are expected to promote safeguarding through their behaviour and decisions.

They should:

- take concerns seriously
- avoid discouraging reporting
- ensure appropriate action is taken when concerns arise
- support staff who follow safeguarding procedures
- maintain confidentiality
- ensure safeguarding responsibilities are understood
- consider safeguarding during programme planning
- allocate reasonable resources to safeguarding; and
- respond to identified weaknesses.

Managers must never knowingly conceal serious safeguarding concerns to protect the reputation of the organisation or an individual.

44. Responsibility of All Personnel

Every person representing NAMBI FOUNDATION is expected to:

- understand this Policy
- follow the Code of Conduct
- maintain appropriate behaviour
- complete relevant safeguarding training
- consider the safety of people affected by their work
- report serious concerns
- cooperate with legitimate safeguarding processes; and
- avoid retaliation against anyone involved in a safeguarding matter.
- Safeguarding is a shared responsibility.

45. Partner Responsibilities

Partners implementing activities connected with NAMBI FOUNDATION should take reasonable steps to:

- protect programme participants
- maintain safeguarding standards
- provide suitable reporting channels
- respond appropriately to complaints
- inform NAMBI FOUNDATION of serious safeguarding concerns affecting joint activities when appropriate
- protect confidentiality
- prevent retaliation; and
- cooperate with safeguarding reviews or investigations where required.

NAMBI FOUNDATION may request information about a partner's safeguarding arrangements before or during a partnership.

46. Contractors and Suppliers

Contractors and suppliers who may come into direct contact with children, vulnerable adults or programme participants should be informed of relevant safeguarding expectations.

Contracts may include safeguarding obligations where appropriate to the type of service provided.

Serious misconduct by contractor or supplier personnel may result in removal from Foundation activities or termination of the relevant commercial relationship.

47. Visitors, Media and External Representatives

Visitors, journalists, photographers, donors and other external representatives participating in NAMBI FOUNDATION activities must behave appropriately around programme participants.

Where they may have direct contact with children or vulnerable people, they should receive relevant safeguarding instructions.

They must not independently collect personal stories, images or contact information in circumstances that bypass consent, privacy or safeguarding procedures.

48. Digital Safeguarding

Safeguarding responsibilities also apply to digital communication.

Personnel must not:

- send sexual or inappropriate content to programme participants
- request sexual images
- engage in inappropriate private communication with children
- publish personal information that creates safety risks
- share safeguarding information through insecure or unnecessary channels; or
- use Foundation communication platforms to harass, exploit or intimidate another person.
- Communication with children should use appropriate, transparent channels whenever possible.

49. Social Media

NAMBI FOUNDATION personnel should consider safeguarding risks before sharing content about Foundation activities on personal or organisational social media.

Images, names, health information, family circumstances, locations or personal stories should not be published when doing so could expose someone to harm or violate their privacy.

A person's vulnerability should never be used as entertainment or publicity.

50. Safeguarding and Fundraising

NAMBI FOUNDATION may share stories about its work to raise awareness and support.

Fundraising materials must nevertheless respect the same safeguarding principles as programme activities.

People should not be pressured to share traumatic experiences for fundraising purposes.

Children and adults should be portrayed with dignity.

Where identifying information is unnecessary, it should be avoided.

The desire to demonstrate impact or attract donations must never override safety, consent or respect for the person represented.

51. Safeguarding During Emergencies

Humanitarian emergencies can increase vulnerability and create greater risks of abuse and exploitation.

Urgency does not remove safeguarding responsibilities.

When programmes are implemented rapidly, NAMBI FOUNDATION should still take reasonable steps to:

- identify safeguarding risks
- communicate expected behaviour
- control access to affected populations
- provide reporting options
- avoid concentrating unchecked authority in one person
- protect children and adults at heightened risk; and
- respond quickly to serious concerns.

52. Local Culture and Safeguarding

NAMBI FOUNDATION respects local traditions, languages, religions and cultural practices.

Personnel should behave sensitively within the communities where they work.

However, culture, tradition or religion must not be used as justification for abuse, exploitation, sexual misconduct, violence against children or other serious safeguarding violations.

Respect for culture and protection from harm should be approached thoughtfully and responsibly.

53. Non-Discrimination in Safeguarding

Every safeguarding concern should be taken seriously regardless of the identity or status of the people involved.

Protection must not depend on nationality, ethnicity, race, religion, sex, gender, disability, social position, economic status, political affiliation, sexual orientation or other personal characteristics.

Safeguarding standards also apply when the alleged person responsible holds a senior position, is a donor, partner, manager or otherwise has influence within the organisation.

54. Disciplinary and Contractual Consequences

A confirmed breach of this Policy may result in action appropriate to the seriousness of the conduct.

Possible measures may include:

- additional training
- formal warning
- change of responsibilities
- restrictions on programme contact
- suspension
- termination of employment
- termination of volunteering or consultancy arrangements
- termination of partnership or supplier agreements
- recovery of organisational property
- referral to professional bodies; or
- referral to relevant authorities where appropriate.

Sexual exploitation, sexual abuse, serious child safeguarding violations, trafficking and other severe forms of abuse may constitute gross misconduct.

55. Learning From Safeguarding Concerns

Safeguarding incidents should not only be handled as individual cases.

Where appropriate, NAMBI FOUNDATION should examine whether an incident identifies weaknesses in:

- recruitment
- supervision
- programme design
- beneficiary selection
- reporting mechanisms
- staff training

- partner management
- data protection
- community communication; or
- other organisational practices.
- Lessons should be used to strengthen future prevention.

56. Review of Safeguarding Measures

NAMBI FOUNDATION should review this Policy periodically and update it when necessary.

A review may also be required following:

- a serious safeguarding incident
- changes in Foundation activities
- significant organisational growth
- changes in applicable law
- new categories of programme participants
- expansion into new locations; or
- identified weaknesses in existing safeguarding procedures.

57. Relationship With Other NAMBI FOUNDATION Policies

This Safeguarding Policy should be read together with other relevant NAMBI FOUNDATION standards and procedures, including where applicable:

- the NAMBI FOUNDATION Code of Conduct
- Child Safeguarding procedures
- Prevention of Sexual Exploitation and Abuse requirements
- Whistleblowing and reporting procedures
- Complaints and Feedback procedures
- Data Protection and Privacy requirements
- Human Resources procedures
- Anti-Fraud and Anti-Corruption standards; and
- Health, Safety and Security procedures.

Where several policies apply to the same concern, they should be interpreted consistently with the primary objective of protecting people from harm while ensuring a fair and responsible process.

58. Acceptance of the Policy

Employees, volunteers, consultants and other relevant representatives may be required to confirm that they have received, understood and agreed to follow this Policy.

Safeguarding obligations may also be included in employment agreements, volunteer agreements, consultancy contracts, partnership agreements and other arrangements connected with NAMBI FOUNDATION.

59. Final Commitment

NAMBI FOUNDATION recognises that trust is essential to humanitarian, charitable and community work.

People who engage with our programmes should be able to do so without fear that their vulnerability, circumstances or trust will be used against them.

We therefore commit to building an organisational culture in which safeguarding is part of everyday decision-making, concerns can be raised safely, people are treated with dignity and those entrusted with responsibility understand that the protection of people comes before personal interests, institutional convenience or reputation.