

Safeguarding Policy



HCPL Safeguarding Policy

1. Introduction

HIMAT Consulting Private Limited (HCPL) is committed to providing a safe, respectful, and protective environment for children, young people, adults at risk, employees, partners, and communities we work with. Safeguarding is central to HCPL's mission of delivering evidence-based, inclusive, and sustainable development solutions.

This policy integrates international standards (UNCRC 1989, UN Declaration of Human Rights, IASC PSEA, OECD Guidelines, WHO Research Ethics) with national legislation (Pakistan Child Protection Act 2016, Protection Against Harassment of Women at Workplace Act 2010, and relevant provincial laws).

2. Scope

This policy applies to:

- All HCPL employees, consultants, board members, volunteers, interns, and contractors.
- Partner organizations, enumerators, sub-contractors, and suppliers.
- All research participants, program beneficiaries, and communities engaged through HCPL.

It covers **child safeguarding, adult safeguarding, gender-based violence (GBV), sexual exploitation and abuse (SEA), workplace harassment, and digital safeguarding.**

3. Purpose

The policy ensures that:

- All HCPL staff understand their safeguarding roles and responsibilities.
- Systems are in place to prevent, report, and respond to harm.
- HCPL complies with donor safeguarding standards (UNICEF, GIZ, World Bank, EU, FCDO, etc.).
- Communities and participants are empowered with awareness of their rights.

4. Definitions

- **Child:** Any person under 18 years of age (UNCRC, Pakistan Child Protection Act).
- **Adult at Risk:** A person 18 or older who may be vulnerable due to disability, illness, age, displacement, gender, or social exclusion.
- **Safeguarding:** Preventing harm, abuse, neglect, exploitation, harassment, and ensuring dignity.
- **Sexual Exploitation and Abuse (SEA):** Any actual or attempted abuse of position of vulnerability, differential power, or trust for sexual purposes.
- **Harassment:** Unwelcome conduct based on sex, gender, ethnicity, disability, or belief that creates a hostile environment.

5. Objectives

HCPL commits to:

1. A **safe organizational ethos** based on respect and accountability.
2. **Safe environments** for staff and communities.
3. **Safe processes** for recruitment, participation, research, and reporting.
4. **Safe information management** (GDPR-equivalent compliance).
5. **Safe staff and partners** trained and monitored to uphold safeguarding.

6. Types of Harm Addressed

This policy addresses:

- **Child abuse and neglect** (physical, emotional, sexual, exploitation, neglect, trafficking, online abuse).
- **Abuse of adults at risk** (physical, sexual, psychological, financial, neglect, discriminatory abuse).
- **GBV and SEA** in communities and workplace settings.
- **Sexual harassment** at the workplace (as per Pakistan law and ILO conventions).
- **Bullying and cyber harassment** including digital exploitation.

7. Principles

HCPL will:

- Apply a **zero-tolerance policy** to all forms of abuse, exploitation, and harassment.
- Prioritize the **best interests of children and vulnerable adults**.
- Ensure **non-discrimination** regardless of gender, ethnicity, disability, sexual orientation, or beliefs.
- Respect **confidentiality** and survivor dignity in all responses.
- Uphold the **Do No Harm** principle across all programs and research.

8. Safeguarding Standards and Procedures

8.1 Recruitment and Human Resources

- Pre-employment **background and reference checks**.
- Mandatory **code of conduct signing** for all staff and consultants.
- Safeguarding and PSEA clauses included in all contracts.

8.2 Training and Awareness

- Induction training on safeguarding, ethics, and workplace harassment for all new staff.
- Annual refresher courses for all employees, consultants, and enumerators.
- Community awareness sessions in program areas.

8.3 Reporting and Complaints Mechanism

- **Multiple safe channels** for reporting: hotline, email, suggestion box, safeguarding focal persons.
- Anonymous reporting allowed.
- Complaints managed by HCPL's **Safeguarding and Ethics Focal Person (SEFP)**.
- All cases documented and investigated within **30 working days**.
- **Referral pathways** established for survivors (health, psychosocial, legal, protection).

8.4 Protection from Retaliation

- Whistleblowers and complainants are protected from retaliation.
- Disciplinary action for retaliation against reporters.

8.5 Investigation and Disciplinary Measures

- Investigations carried out by HR and SEFP or external third-party (for senior management cases).
- Sanctions may include warnings, suspension, termination, reporting to authorities.

9. Roles and Responsibilities

- **Board of Directors:** Oversight and annual policy approval.
- **Safeguarding and Ethics Focal Person (SEFP):** Policy implementation and compliance monitoring.
- **Safeguarding Focal Points (SFPs):** Assigned in each project for field-level support.
- **All Staff/Consultants:** Duty to report safeguarding concerns.
- **Partners and Contractors:** Must comply with HCPL safeguarding standards.

10. Data and Digital Safeguarding

- Personal data must be **collected with consent**, anonymized, and securely stored.
- No unauthorized photography, recording, or data sharing of participants.
- Digital platforms used for research and M&E must include **data encryption** and role-based access.

11. Alignment with Local Regulations

- Pakistan Child Protection Act 2016 (federal and provincial variants).
- Protection Against Harassment of Women at Workplace Act 2010.
- Criminal Law (Amendment) Act 2016 (criminalizes child abuse and sexual exploitation).
- ICT and Cybercrime Acts (for online abuse prevention).

12. Monitoring, Review, and Accountability

- Policy reviewed **annually** and updated with global and national legal requirements.
- Quarterly safeguarding reports submitted to HCPL Board.
- Lessons learned from investigations incorporated into revisions.
- External audits may be commissioned by donors to ensure compliance.

13. Annexes

- Annex 1: **Code of Conduct** for Staff, Consultants, and Partners.
- Annex 2: **Reporting Form** for Safeguarding Incidents.
- Annex 3: **Safeguarding Focal Points Directory**.
- Annex 4: **Survivor Referral Pathway (Health, Legal, Psychosocial Support)**.

Annex 2 – Safeguarding Incident Reporting Form

CONFIDENTIAL – To be submitted to Safeguarding Focal Point / SEC

- **Date of Report:** _____
- **Reporter Name & Contact (or anonymous):** _____
- **Person at Risk (if known):**
 - Name: _____
 - Age/Gender: _____
 - Community/Location: _____
- **Description of Concern/Incident:**
(What happened, when, where, who was involved, immediate risks identified)
- **Any Immediate Action Taken:** _____
- **Other Agencies Informed (if any):** _____

Signature (if not anonymous): _____

Annex 3 – Safeguarding Focal Points Directory

HCPL will maintain an **updated directory** for each project and office, with:

- **Name of Focal Point**
- **Designation**
- **Phone/Email**
- **Languages Spoken**
- **Backup Contact Person**

This will be displayed in offices, field sites, and community spaces in **local languages**.

Annex 4 – Survivor Referral Pathway

If a safeguarding case is identified, HCPL staff must follow the **Referral Pathway** below:

1. **Immediate Response**
 - Ensure survivor safety first.
 - Do not conduct detailed investigation; only gather minimum information.
 - Provide urgent medical care if required.
2. **Internal Reporting**
 - Report to HCPL Safeguarding Focal Point / SEC within **24 hours**.
 - Complete the Incident Reporting Form (Annex 2).
3. **Referral to Services**
 - **Medical Support:** Local hospital / Basic Health Unit (BHU).
 - **Psychosocial Support:** Accredited counselling or NGO partner.
 - **Legal Protection:** Police Child/Women Protection Units, Legal Aid NGOs.
 - **Shelter Services:** Government/NGO safe houses (e.g., Dar-ul-Aman).
4. **Follow-up**
 - SEC ensures survivor receives ongoing support.
 - Confidential monitoring without retaliation or exposure.