



SAFEGUARDING POLICY

(Updated 30/03/2025)

1. INTRODUCTION

Inclusive and Affirming Ministries (IAM) is committed to putting safeguards in place to prevent the likelihood of sexual exploitation, bullying, abuse or any form of harassment from taking place in the organisation, and to those accessing the services the organisation offers. All individuals involved with IAM shall be treated with respect and dignity. The aim of this policy is to ensure that all staff members, volunteers, consultants, network partners and service providers act appropriately in response to concerns raised around sexual exploitation, abuse, bullying and harassment.

2. PURPOSE

The purpose of this policy is to:

- Enable IAM to demonstrate its commitment to safeguarding staff, volunteers and the community which encounter IAM from deliberate or inadvertent actions.
- Ensure that everyone associated with IAM is aware of their obligations and responds appropriately to issues of sexual exploitation, abuse and harassment of children and vulnerable adults and the community within which IAM operates.
- Ensure that everyone who represents the organisation must actively create a safe environment for individuals and organizations that encounter IAM.
- Ensure that learners or children who are associated with IAM are not intimidated and/or bullied, harassed or sexually exploited in any way; and
- Ensure that all activities and programmes are assessed for risks to the community and such risks are reduced or removed as far as is reasonably possible.

3. SCOPE

This policy applies to employees at all levels of the organisation, including applicants for employment, managers, director, board members, interns, volunteers, consultants, and network partners. All cases of Safeguarding shall be overseen by the Human Resources (HR) Unit and an investigator with expertise in gender-based violence, sexual harassment and labour law shall be appointed annually by the Board. Should any of the individuals listed below be the alleged perpetrator the Chairperson of the Board shall be informed immediately and shall take steps on who shall lead on the matter.

To this purpose all parties mentioned above will be trained and updated annually and during induction. The policy will be reviewed annually by the Board and signed by the designated safeguarding officer at Board (see #10).

Roles of various staff members and others involved.

- 3.1. Complainant: A person who makes a formal complaint that they have been sexually harassed or witnessed someone being sexually harassed. The



- complainant may choose not to talk to their direct line manager but to the head of the Unit or the Director.
- 3.2. Line Manager: To be kept informed of the charges and investigation.
 - 3.3. HR Unit: To be kept informed of the charges and investigation.
 - 3.4. HR Unit: The Human Resources Unit will be responsible for coordinating investigation processes and hearings, seeking legal advice where necessary, keeping the Senior Management Team (SMT) and/or Director informed of allegations, progress, and outcomes. They will ensure that all actions are compliant with the organizational policies, the Sexual Offences Act and the South African Constitution.
 - 3.5. Investigator: The investigator will be appointed by the SMT on an annual basis and will be responsible for investigating the charges, participating in hearings, provide the HR Unit with their legal expertise and advice, and provide the HR Unit with their findings.
 - 3.6. Chairperson of the hearing: To hear the case presented and present a finding.
 - 3.7. Director: To be informed of all allegations and to receive the investigator and chairperson's report.
 - 3.8. SMT: Initiate investigations, proceed with hearings, accept/not accept resignations with immediate effect and settle matters at the Commission for Conciliation, Mediation and Arbitration (CCMA).
 - 3.9. HR Board Sub-Committees: To be informed of all allegations, receive the investigator and chairperson's report and provide non-binding opinions as sought by the Director.
 - 3.10. Sexual Harassment Support Team (SHST) Member: Two staff members shall be appointed as SHST members to support victims of Safeguarding. The SHST member should record the nature of the allegation, liaise with the investigator and/or HR on behalf of the complaint and be present at any stage during the formal and informal processes if the complainant requests support.

4. DEFINITIONS OF KEY TERMS

- 4.1. Abuse: is a violation of an individual's human and civil rights by any other person or persons.
- 4.2. Bullying: is unwanted, aggressive behaviour that involves a real or perceived power imbalance. The behaviour is repeated or has the potential to be repeated over time.
- 4.3. Child: is defined as anyone under the age of 18 years.
- 4.4. Harassment: Harassment is unwanted conduct which occur on grounds of equality, which makes a person feel intimidated, offended, which damages, or which is done with the aim of damaging, a person's dignity or creating an



intimidating, hostile, degrading, humiliating or offensive environment for that person.

- 4.5. Intimidation: Unlawful act of intentionally coercing or frightening someone to do (or not do) something against their will, such as forcing staff not to speak in meetings and if they do they shall be disciplined.
- 4.6. Violation: Is referred to a breach, infringement or transgression of a rule, law or policy.
- 4.7. Vulnerable adult: A person aged 18 years or over who is, or may be, at risk of abuse due to gender, economic, social, political, cultural and/or other reasons or circumstances and is in need of community care services, or is a resident in a care facility by reason of mental or other disability, age or illness, or who is, or may be, unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.
- 4.8. Workplace: refers to the IAM premises, virtual workplaces, teleconferences and any other space or situation in which employees, fellows, interns, consultants, volunteers and CAT members interact.
- 4.9. Rape: Non-consensual penetration, however slight, of the vagina, anus or mouth by a penis or any other body part or object.
- 4.10. Safeguarding: Safeguarding is a term used to denote measures to protect the health, well-being and human rights of individuals, which allow people, especially children, young people and vulnerable adults to live free from abuse, harassment, harm and/or neglect.
- 4.11. 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.
- 4.12. Sexual abuse: Actual or threatened sexual violence or other acts, including but not limited to rape, sexual assault and sexual harassment.
- 4.13. Sexual assault: Sexual assault is an act in which a person intentionally sexually touches another person without that person's consent or coerces or physically forces a person to engage in a sexual act against their will. It is a form of sexual violence which includes rape (forced vaginal, anal or oral penetration or drug facilitated sexual assault), groping, child sexual abuse or the torture of the person in a sexual manner.
- 4.14. Sexual bribery: A form of quid pro quo harassment in which a sexual relationship with a manager, superior or co-worker is made an explicit or implied condition for obtaining/retaining employment or its benefits.
- 4.15. Sexual harassment: Sexual harassment is bullying or coercion of a sexual nature or the unwelcome or inappropriate promise of rewards in exchange for sexual favours. It is the unwanted sexual advances or remarks, including both verbal



and non-verbal conduct. Examples include but are not limited to non-consensual physical touching, lewd or obscene sexual jokes, whistling, rude gestures, questioning someone about their sex life or sexual orientation or their gender identity, requests for sex, promising someone rewards in exchange for sexual favours, staring at someone's body, commenting on someone's state of dress or gender-based slurs.

5. PREVENTING SEXUAL EXPLOITATION, HARASSMENT AND ABUSE OF IAM STAFF AND NON-IAM STAFF, INCLUDING LEARNERS AND CHILDREN

IAM believes that it is important to have a clearly defined and well thought through plan to prevent sexual exploitation, harassment, bullying and abuse of staff members and individuals that the organisation comes into contact with IAM commits to implementing the following steps:

- 5.1. IAM will conduct annual training on sexual exploitation, bullying, harassment, and abuse for all staff, , volunteers and Board Members that is in line with international best practice. It will include an overview of the law, a review of IAM's policies and training, and how to contribute to a culture in which all staff are treated as equals and employees treat one another with respect and unambiguously reject harassment, holding each other accountable to high standards within the workplace.
- 5.2. Ensure that the culture within IAM provides a safe and trusted environment that encourages those affected to come forward and report incidents.
- 5.3. Ensure that the highest safeguarding standards are applied throughout our programmes and that best practice is shared across the sector.
- 5.4. Ensure that IAM representatives do not develop relationships with the community or individuals which could in any way be deemed exploitative or abusive.
- 5.5. Use language, make suggestions, or offer advice, which is inappropriate, offensive or abusive.
- 5.6. Ensure that everyone who represents IAM create a safe environment for the individuals that they encounter from exploitation and harm.
- 5.7. Include questions on adherence to IAM's values, including sexual exploitation, harassment, abuse, commitment to equality and non-discrimination in recruitment processes.
- 5.8. Maintain a whistle blowing email address where staff and non-staff can email all incidences of concern, including sexual exploitation, abuse and bullying.
- 5.9. Monitor all incidents of harassment and bullying and review the effectiveness of this policy periodically.
- 5.10. Keep a register that records details of harassment, abuse, sexual exploitation, and discrimination.



- 5.11. Ensure that all complaints of harassment, abuse and sexual exploitation are dealt with promptly, seriously and confidentially and in accordance with our internal grievance procedure.
- 5.12. Develop a risk management strategy on safeguarding; and
- 5.13. Include a criminal background check as part of the recruitment process.

6. BEHAVIOUR CONSTITUTING ABUSE, SEXUAL EXPLOITATION, HARASSMENT, AND DISCRIMINATION:

- 6.1. The following behaviour constitutes sexual exploitation:
 - 6.1.1. Rape.
 - 6.1.2. Sexual abuse.
 - 6.1.3. Sexual assault.
 - 6.1.4. Sexual harassment.
 - 6.1.5. Sexual bribery.
- 6.2. Behaviour constituting abuse:
 - 6.2.1. **Physical abuse:** includes hitting, slapping, punching, burning, misuse of medication and inappropriate restraint.
 - 6.2.2. **Sexual abuse:** includes rape, indecent assault, inappropriate touching, exposure to pornographic material.
 - 6.2.3. **Psychological or emotional abuse** includes belittling, name calling, threats of harm, intimidation, isolation.
 - 6.2.4. **Financial or material abuse** includes stealing, selling assets, fraud, misuse or misappropriation of property, possessions or benefits.
 - 6.2.5. **Institutional or organisational abuse:** unsafe practices and lack of person-centred care or treatment.

7. HARASSMENT

Harassment is unwanted conduct which occur on grounds of equality, which makes a person feel intimidated, offended, which damages, or which is done with the aim of damaging, a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person. Harassment also refers to when someone is treated unfairly or discriminated against because they belong to a particular group of people or have a particular characteristic. Discrimination can be based on the following:

- 7.1. Race.
- 7.2. Gender.
- 7.3. Sex.
- 7.4. Ethnic or social origin.
- 7.5. Sexual orientation gender identity and sexual characteristics.
- 7.6. Age.
- 7.7. Disability.
- 7.8. Religion.
- 7.9. HIV status.



- 7.10. Political opinion/affiliation.
- 7.11. Culture.
- 7.12. language; and
- 7.13. Any other arbitrary grounds.

8. BEHAVIOUR CONSTITUTING BULLYING

The following behaviour constitutes bullying:

- 8.1. Verbal bullying: Slandering, ridiculing or maligning a person or his or her family; persistent name calling that is hurtful, insulting or humiliating; a person the centre/focus of jokes and abusive and offensive remarks.
- 8.2. Physical bullying: Pushing, shoving, kicking, poking, tripping, assault or threat of physical assault, damage to a person's work area or property.
- 8.3. Gesture bullying: Nonverbal threatening gestures; pointing fingers in an intimidating manner and/or in someone's face, glances that can convey threatening messages.
- 8.4. Writing (e.g., via email, internet chat rooms, instant messaging and text messaging and all forms of social media).
- 8.5. Socially or physically excluding, isolating, or disregarding a person in work-related activities.

Others forms of bullying behaviour:

- 8.6. Intimidating, hostile or threatening behaviour.
- 8.7. Humiliating, belittling or embarrassing someone through sarcasm or insults.
- 8.8. Spreading misinformation or malicious rumours about someone.
- 8.9. Deliberately withholding or denying access to information, supervision, technical assistance, support, consultation or resources that are necessary for effective work performance, resulting in detrimental effects to the employee's wellbeing and/or performance.
- 8.10. Setting unreasonable timelines or constantly changing deadlines.
- 8.11. Unreasonably overloading a person with work, or not providing enough work.
- 8.12. Assigning tasks that are unreasonably below or beyond a person's skill level.
- 8.13. Giving someone the majority of unpleasant or challenging tasks; and
- 8.14. Improper treatment in relation to accessing workplace entitlements, such as leave, allowances or training.

9. REPORTING PROCEDURES TO FOLLOW FOR COMPLAINANTS

The complainant can choose to deal with the matter either formally or informally and the HR Unit (where they are not implicated) shall discuss both options and make recommendations.

9.1. The informal procedure: Discussion between both parties:

- 9.1.1. Talking to the perpetrator and telling them to stop the behaviour that makes you feel uncomfortable.
- 9.1.2. Emailing the perpetrator and telling them their behaviour makes you uncomfortable and telling them to stop. The complainant must mention the specific acts/things that make them feel uncomfortable. A copy of the communication must be kept in the files of both parties.



- 9.1.3. The complainant may seek advice on possible strategies from their manager, or the HR Unit.
- 9.1.4. The complainant asks their manager or the Sexual Harassment Team Member to speak to the alleged harasser on their behalf. The manager or co-worker privately and confidentially conveys the complainant's concerns and reiterates the organization's safeguarding policy to the alleged harasser without assessing the merits of the case.
- 9.1.5. If an informal complaint is made and the harasser admits the behaviour, an investigation is not required, and the complaint can be resolved through conciliation or counselling of the complainant and the harasser; and
- 9.1.6. A supervisor, manager or co-worker observes unacceptable conduct occurring and takes independent action even though no complaint has been made.

Informal action is usually appropriate where:

- 9.1.7. The allegations are of a less serious nature but the individual alleging the behaviour wants it to cease, nonetheless.
- 9.1.8. The individual alleging the behaviour wishes to pursue an informal resolution.
- 9.1.9. The parties are likely to have ongoing contact with one another and the complainant wishes to pursue an informal resolution so that the working relationship can be sustained; and
- 9.1.10. However, IAM reserves the right to proceed with disciplinary action if the organisation views the alleged harassment to be serious enough to represent a threat to others or if it is deemed to threaten the organisation's values or bring the organisation into disrepute. The decision to proceed will be taken in consultation with the Director, the Chairperson of the Board and HR.

9.2. The formal procedure: Proceeding to a Disciplinary Hearing

- 9.2.1. The complainant shall inform either the HR Unit; direct line manager, director and/or board member (provided that they are not implicated) immediately of the alleged harassment, sexual exploitation, abuse, bullying or discrimination and that they want to proceed with formal disciplinary action.
- 9.2.2. HR Unit shall inform the investigator of the matter and to commence with investigations by sensitively interviewing the complainant(s) and/or witnesses, and getting written statements where reasonably possible; and
- 9.2.3. If the allegations are serious and there are reasonable prospects of proving the allegations against the accused on a balance of probability, then normal disciplinary procedures in respect of a formal disciplinary hearing, as outlined in the Disciplinary Policy, shall be followed.
- 9.2.4. It is a disciplinary offence to victimise or retaliate against an employee who in good faith lodges a grievance of sexual exploitation, abuse, bullying or harassment, or to pressurise a complainant to drop a complaint.
- 9.2.5. IAM reserves the right to proceed with disciplinary action even if the affected employee elects to withdraw the formal complaint. This will happen only if the organisation views the alleged harassment to be serious enough to represent a threat to others or if it is deemed to threaten the organisation's values or bring



the organisation into disrepute. The decision to proceed will be taken in consultation with the Director and the HR Sub-committee.

10. Responsible Use of Information and Media

IAM is committed to ensuring that all information, stories, and photos shared in its communications, reports, and advocacy work respect the dignity, privacy, and safety of individuals, especially those from vulnerable communities.

10.1. Informed Consent

- Before collecting or using any personal stories, images, or identifiable information, IAM will seek explicit, informed, and voluntary consent from the individuals involved.
- For minors or individuals in vulnerable situations, consent must be obtained from a legal guardian or authorized representative.
- Consent forms should specify how the information or images will be used, including the platforms (e.g., website, social media, reports).

10.2. Dignity and Anonymity

- IAM will prioritize portraying individuals with dignity, avoiding imagery or narratives that sensationalize, exploit, or reinforce stereotypes.
- Where necessary, names and identifying details will be anonymized to protect privacy and security, especially for individuals facing discrimination or harm.

10.3. Secure Storage and Use

- Photos, interviews, and personal data will be securely stored and only accessible to authorized personnel.
- Information and media will only be used for the purposes stated in the consent process and will not be shared with third parties without additional permission.

10.4. Withdrawal of Consent

- Individuals have the right to withdraw their consent at any time, and IAM will ensure that their information or images are no longer used in future materials.

11. Reporting contact details and/or anonymously to the Hot Line

If an employee has reason to believe that another employee of IAM has engaged in any action that violates any law or regulation, IAM's HR. policies and procedures; the employee is expected to report such information to the following:

- Senior designated safeguarding officer of IAM Board: Lauren Matthew cell 082 775 9469 or lolliedubes@gmail.com

12. CONFIDENTIALITY

All allegations/concerns shall be treated with confidentiality. For this reason, all complaints shall be investigated and dealt with in a manner that seeks to ensure that the



identities of the persons involved are kept confidential.

- 12.1 IAM Management and employees shall ensure that grievances are investigated, & led sensitively in a manner that ensures that the identities of the persons involved are kept private and confidential as far as is reasonably possible.
- 12.2 Management, employees and the parties concerned must ensure privacy and confidentiality as far as possible even when the matter proceeds to a disciplinary hearing. Only appropriate members of management, the H.R. Unit Manager, the aggrieved person, alleged perpetrator, witnesses and an interpreter if required.
- 12.3 The organisation is required to disclose to either party such information that may be necessary to enable the parties to prepare for internal or external procedures and/ or civil or criminal proceedings.

13. Employee Wellness Programme

The complainant and/or the alleged perpetrator of the harassment, who has been found innocent or unjustly accused, may apply for assistance in terms of the organisations Employee Wellness Programme, including the application for leave or trauma counselling where such proceedings have impacted on the employee's work performance or psychological wellbeing.

14. Criminal and civil charges

Complainants lodging a grievance have the right to press separate criminal and/or civil charges against alleged perpetrators.

15. Dispute resolution

Should a complaint of alleged harassment, sexual exploitation, abuse, and discrimination not be satisfactorily resolved by the internal procedures set out above, either party may within 30 days of the dispute having arisen, refer the matter to the CCMA for conciliation. Should the dispute still remain unresolved, either party may refer the dispute to the Labour Court.

16. Conclusion



Employees are expected to respect one another’s integrity, dignity, privacy and their right to equality at all times, and to note that the organisation views any form of harassment, exploitation, bullying and discrimination extremely seriously and disciplinary action including summary dismissal may result after following due process.

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