

# ACHIEVING SAFEGUARDING COMPLIANCE – THE GUIDELINES

Modern Architects of Rural India (MARI), Hyderabad



# **Achieving Safeguarding Compliance The Guidelines**

**Modern Architects of Rural India (MARI), Hyderabad**

12-13-677/66, Kimtee Colony, Street No. 1

Tarnaka, SECUNDERABAD – 500 017, Telangana, India.

This document is approved by the Executive Committee of MARI at its meeting held on 2<sup>nd</sup> June 2026. The document is to guide MARI in rolling out and continue practices which meets the minimum international requirements on safeguarding.

## Foreword

Modern Architects for Rural India (MARI) has, since its inception, remained committed to promoting the dignity, rights, safety, and well-being of all individuals with whom we work and interact. As an organization dedicated to serving vulnerable communities, we recognize that our responsibility extends beyond program implementation to ensuring that every person associated with our work is protected from harm, abuse, exploitation, harassment, discrimination, and neglect.

The development of these *Safeguarding Compliance Guidelines* represents a significant milestone in strengthening MARI's commitment to creating and maintaining a safe, respectful, and accountable environment for staff, volunteers, interns, consultants, partners, contractors, service providers, and community members. These guidelines have been developed through a process of institutional learning, reflection, and adaptation of internationally recognized safeguarding standards, while ensuring alignment with Indian legal frameworks and the realities of our operational context.

Safeguarding is not merely a policy requirement; it is a core organizational value. It reflects our commitment to the principle of "Do No Harm" and reinforces our collective responsibility to prevent and respond effectively to all forms of Sexual Exploitation, Abuse and Harassment (SEAH), workplace harassment, bullying, child abuse, trafficking, forced labour, and other forms of misconduct. We firmly uphold a zero-tolerance approach toward any behaviour that compromises the safety, dignity, or rights of individuals.

These guidelines provide practical direction on safeguarding responsibilities, codes of conduct, safe recruitment practices, staff orientation, complaint and response mechanisms, survivor referral services, investigation procedures, and accountability measures. They are intended to ensure that safeguarding is integrated into every aspect of MARI's governance, management, programs, partnerships, and community engagement processes.

The success of this safeguarding framework depends on the commitment of every individual associated with MARI. We expect all personnel and partners to understand, embrace, and actively uphold these standards in both their professional conduct and interactions with others. Through collective vigilance, transparency, and accountability, we can foster a culture where concerns are reported without fear, survivors are treated with dignity and respect, and appropriate action is taken whenever violations occur.

I extend my appreciation to all those who contributed to the development and strengthening of these guidelines. Let us work together to ensure that MARI remains a trusted, safe, and ethical organization that places the protection and well-being of people at the centre of everything we do.

**RAMISETTY MURALI**

Executive Director

## Foreword

### Section 1 : Purpose and Scope

### Section 2: Practising Code of Conduct

### Section 3: Incorporating Safeguarding Clauses in Contracts & Agreements

- Clauses for suppliers & service providers
- Clauses for partners

### Section 4: Guidelines on Safe Recruitment Measures

- Template for safeguarding reference checking
- Template for safeguarding self-declaration form

### Section 5: Introducing Mandatory Safeguarding Orientation

### Section 6: Roadmap for Setting up of Feedback, Complaints and Response Mechanism (FCRM) in the Community

- How to set up FCRM
- Flow chart

### Section 7: Guide on Mapping Essential Services for the Safeguarding (SEAH) Survivors

- How to do
- Mapped Essential services

### Section 8: Guidelines on Investigation Procedures & Disciplinary Measures

- Template of Investigation procedures
- Safeguarding case register

## Annexures

### Section 4

- Notes for the mandatory safeguarding orientation PPT
- Additional Readings

### Section 6

- Safeguarding Incident Report Form
- Register of Safeguarding Allegations—Confidential and Restricted Access
- Credibility/Plausibility Assessment Form
- Investigation Risk Management Plan
- Donor Notification Template
- Investigator Terms of Reference
- Investigation Plan

- Subject of Investigation—Notification Letter
- Record of Interview
- Investigation Report Template
- Opportunity to Respond
- Outcome Letter to the Subject of the Investigation
- Interview Preamble
- Confidentiality Form

## Section 1

### Purpose and Scope

**Applies to:** [all staff, labors, Interns, Volunteers, Affiliates, Visitors]

**Revised On:** June 2026

**Next Revision Date:** June 2027

#### **Purpose and Commitment to Safeguarding**

Modern Architects of Rural India (MARI) is committed to ensuring that all individuals associated with its work are protected from harm, abuse, exploitation, harassment, and bullying. Safeguarding is central to MARI's commitment to **do no harm** and applies to its staff, partners, programs, and operations.

MARI maintains **zero tolerance for Sexual Exploitation, Abuse and Harassment (SEAH), non-sexual harassment, and bullying**, and is committed to preventing, reporting, and responding to safeguarding concerns in a timely, fair, and survivor-centred manner.

Safeguarding refers to MARI's responsibility to ensure that its staff, affiliates, partners, and activities **do not cause harm or place anyone at risk of Sexual Exploitation, Abuse and Harassment (SEAH), non-sexual harassment, bullying, or other forms of abuse or exploitation**. These responsibilities are further explained in the Code of Conduct and are operationalised through the policies, procedures, and systems outlined in this document.

#### **Safeguarding covers:**

- Abuse or exploitation of program participants and community members
- Sexual Exploitation, Abuse and Harassment (SEAH)
- **Non-sexual harassment and bullying within the workplace**
- Physical and emotional abuse, neglect, trafficking, and child labour
- Safeguarding applies at all times, including in offices, communities, field locations, and digital or online spaces.

#### **Scope and Applicability**

This policy applies to all persons associated with MARI, including board members, staff, interns, volunteers, consultants, partners, contractors, suppliers, and visitors.

Compliance with this policy is a **condition of engagement** with MARI. Violations may result in disciplinary action, termination of contract, and/or referral to competent authorities

## Section 2

## Practising MARI Code of Conduct

**Applies to:** [all staff, labors, Interns, Volunteers, Affiliates, Visitors]

**Revised On:** June 2026

**Next Revision Date:** June 2027

To be signed by all who comes under the scope of MARI Code of Conduct and to be retained in their personnel file.

**(As amended and adopted by the Executive Committee on 18th April 2024)**

MARI recognizes the need to run the organization in an efficient and disciplined manner. Therefore, it is imperative to formulate and lay down clear and transparent CODE OF CONDUCT binding all the constituents of the organization, including Staff members and the management personnel. The following Charter / Policy is laid down for compliance by MARI.

This Policy envisages that all the persons forming part of and representing MARI ( hereinafter called and referred to as MARI PERSONNEL ) in whatever capacity and status, including but not limited to Members, Executive Committee Members, Management Personnel, Project Personnel and all Employees and Persons working for the organization, by whatever name called and referred to (including but not limited to Staff Members, Affiliates, Trainees, Interns, Volunteers, Consultants, Vendors who may visit or any work place of MARI) and wherever located ( whether during and/or outside the working hours and / or whether at the working place and / or outside in the field locations), are covered for the purposes of compliance of the presents herein. Further, in all the Agreements with Sub-recipients, MARI shall seek the Sub-Recipient to adhere to the safeguarding policy (reporting incidents of suspicion etc.) through an addendum (wherever applicable and as the case may be). MARI shall also seek and ensure that specific terms and conditions relating to Safeguarding Policies are incorporated in all the Agreements that MARI enters with.

The below defined terms (whenever / wherever found deficient) shall be deemed to convey and meet the full text and meaning thereof as envisaged by any International / National Institution or Governing Body, dealing with such subject, wherever so expressly and to the extent required:

- a) The Word — **Employee** means and implies any person whose remunerations are paid by the organization, in whatever position – the nature of employment being permanent or temporary – including Interns, Trainees, Volunteers, Honorary Staff Members and all their Affiliates, Field Facilitators and P.U. Managers.
- b) The Word — **Misconduct / Harassment / Exploitation / Abuse** shall mean and include such a behaviour including a set of behaviours connoting sexual in nature, that targets a person / group of persons, because of their particular identified aspect, viz., age, sex, religion or ethnic group, through usage of derogatory statements; sharing written or graphic material that is intended to insult; making jokes about a race or ethnic group; derogatory remarks about one’s disability and name-calling or insults related to religion.
- c) The Words — **Code of Conduct** mean, imply and represent any act or series of acts conceived of any employee that is intended to ensure the smooth running of the organization, besides protecting and upholding its integrity and welfare each individual working for the organization.
- d) The word — **Misconduct** means and imply, any act of the Staff or Affiliate or any person referred to herein above ( including any act that is in contravention or violation of the terms of Appointment Letter ) that is detrimental to the interests of the Organization (whether directly or indirectly and whether during and / or

outside the working hours and / or whether at the working place or outside) including but not limited to any acts of sexual abuse, sexual harassment and sexual exploitation, Physical abuse (including hitting, kicking, slapping, punching, burning, choking, torture, shaking, throwing objects at any person, through non-accidental use of physical force or actual injury or suffering); Emotional abuse (including name calling, humiliating punishments, continuously making fun of someone, threats, constant criticism, persistent shaming, discrimination, exclusion and isolation through persistent or severe ill-treatment); Sexual abuse (including inappropriate touching, using sexually explicit language, sending sexually explicit messages, photographs or images, showing pornographic material, taking pornographic picture, rape and assault, through any force, coercion or unequal condition); Exploitation (including child labour, sexual exploitation, trafficking through use of forms of coercion, abduction, fraud, deception, abuse of power or position of vulnerability); Neglect (including failure to ensure adequate supervision, safe physical environment, appropriate medical care and food or meet basic needs of any participant or community member covered under any program of the organization) ; Prohibited conduct towards children (including spending excessive or unnecessary time alone with the children, encouraging a child beneficiary to interact in a manner that is unrelated to official duties, encouraging a child beneficiary to meet outside of work related activities and befriending or sending private message to a child beneficiary via email, WhatsApp, Facebook or any other social media platform); workplace harassment (including using of derogatory statements or abusive words, sharing written or graphic material that insults, stereotypes or shows hostility toward an individual, jokes about race or ethnic groups, derogatory comments about disability, name calling or insults related to religion through targeted behaviour intended to demean, threaten, offend or create a hostile working environment); misrepresentation; incitement of colleagues, violation of this Code as well as any other Code or Policy, viz. Anti-Corruption Policy, Gender Equality Policy, Secrecy Policy, Sexual Harassment Policy, Child Protection Policy, Conflict of Interest Policy, Whistle Blower Policy, Anti-Money Laundering Policy, Anti-Human Trafficking Policy, etc. or any express terms and conditions to which he is privy to and specifically:

1) the Sexual Harassment Policy (defined in that exclusive Policy, supra), prohibiting any act or series of acts of harassment {including but not limited to physical, mental and verbal abuse and / or all forms of exploitation} committed at the workplace and/or outside [whether during and / or outside the working hours] by any person of either sex (including Staff and Affiliates) [against any staff and affiliates, program participants and community members] whether the intended objective is achieved or not by the person committing such act.

2 ) Committing or being party to or abetting any act of Human (beings of all ages, whether with or without the consent of the subject individual) trafficking (from one place to another – whether within the country and / or outside the country) in any / all forms including for sexual favour or sexual exploitation or any other form/s of exploitation, like kidnapping and / or subjecting the victim to child labour, adult bonded labour etc. )with an objective of causing gain to one-self or extortion or seeking any other benefit in exchange of such act or for any other purpose. Human Trafficking shall mean and include all such acts as defined by any International Institution/s including UNCRC.

Misconduct by Staff and Affiliates could be of the nature of abusing or exploiting program participants and / or community members (including children as referred to exclusively in Child Protection Policy) OR harassing other staff and / or affiliates.

e) The word —**Sexual Misconduct / Sexual Harassment / Sexual Exploitation / Sexual Abuse** means and includes any unwelcome sexual advances ; request for sexual favour ; verbal or physical conduct or gesture of a sexual nature ; or any other behaviour of a sexual nature that might reasonably be expected / perceived to cause offence or humiliation to another and when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment. Sexual Misconduct could be verbal, physical or visual.

f) The word —**Criminal Misconduct** means and includes any act of the employee and / or affiliate in relation to the Organization where he is working and representing, which is punishable under the Indian Penal Code or any other Act, governing the land, viz., criminal breach of trust, misappropriation of cash or valuables belonging to the Organization or the community with whom MARI works, cheating the organization, defrauding the organization through false claim of expenditure, committing any prohibitive act envisaged in the Penal Acts of the country, including Indian Penal Code constitute Criminal Misconduct etc.

g) **MARI PERSONNEL are bound not to engage in any Prohibited Behaviour (Misconduct)** detailed below:

**Engaging in any form of sexual misconduct, sexual abuse or sexual exploitation of project participants or colleagues or subordinates**, including:

- Touching anyone in a sexual or inappropriate manner
- Making inappropriate or sexualized comments
- Taking or sharing pornographic pictures
- Improperly using your position and power as an aid worker in a relationship with people who need assistance

**Exchanging money, employment, goods or services for sex—including sexual or non sexual favours. This includes:**

- Purchasing Sex
- Exchange of assistance that is due to project participants
- Engaging in trafficking of persons—including withholding identity documents of domestic workers or daily wage workers
- Causing emotional harm to project participants—such as threats, humiliation or discrimination
- Using corporal punishment or causing any other physical harm to project participants
- Meeting or interacting with project participants and / or children that you met through the any project, outside of work-relating activities including interaction via email, text messages, WhatsApp, Facebook or any other social media or virtual platform
- Failing to provide adequate care or supervision and/or failing to provide a safe environment for project participants under your responsibility.
- Having Sexual relations with a child (anyone under 18 years of age) regardless of the local age of consent; mistaken belief regarding the age of a child is not a defence.
- Employing children under 15 years of age for any type of full-time work.
- Employing children under 18 years of age in mentally or physically dangerous employment or employment that interferes with their compulsory schooling
- Spending excessive or unnecessary time alone with a child project participant or a child of an adult project participant.

This policy shall cover all the Staff and Affiliates (whether during and / or outside the working hours and / or whether at the working place and/ or outside) of the organization without any exception.

The management shall provide for a clause in the Employee's appointment letter, implying the commitment of the employee to the Code of Conduct Policy of the Organization. All the personnel of the organization shall subscribe to the tenements of the Policy, IPSO FACTO

The management may hold or aid conduct of Awareness and / or Orientation programmes relating to various Policies of the Organization. Notwithstanding the same, all the employees are deemed to have read the various Policies of the organization have knowledge and subscribe to the same

The Management of MARI shall always be totally committed to the Code of Conduct, Safeguarding and all other policies and all the employees, including affiliates are bound by the same.

- None of the employees shall behave or conduct himself or commit any act of commission or omission, that is detrimental to the interests of the organization and / or its management or colleagues.
- All the employees are prohibited from violating any of MARI's Policies relating to Anti-Corruption, Sexual Harassment, Gender Equality, Code of Secrecy and any other policy that is applicable to the organization.
- All the employees are forbidden from committing prohibited acts – both criminal and civil.
- MARI shall conduct proper orientation to its staff members (at the time of their appointment and thereafter at such other frequent periods) with respect to the various provisions contained in this Policy as also the compliance expected from them and the consequences flowing from the non-compliance of the Policy. The employees shall be furnished with soft copies of all the policies at the time of their appointment (with due acknowledgement and undertaking to comply with the provisions of the policies) and at such other times that the policies are amended or annually, wherever possible or feasible.

The Management of MARI shall evolve and constitute a Reporting Mechanism (in the mode and manner detailed hereinabove) and ensure that the mode of complaint making is transparent; well documented; principles of natural justice are adhered to in letter and spirit and most importantly, the complainant and all the other persons involved in the process of reporting; carrying on investigation; involved in giving evidence etc. are fully protected physically and otherwise { by providing such persons and the related persons (more particularly the survivors and other affected persons) with financial, medical, psychosocial counselling, legal referral support} and that no retaliatory action ( in the form of any adverse employment action or harassment, as regards any staff member or any threatening act towards any outsider) is taken. MARI shall also be obligated to maintain full confidentiality about the allegations, survivor / victim, reporter, witnesses and subject of complaint, as also the contents of any Report, to the extent it is feasible and not otherwise obligated to disclose to entities like Donors, Statutory, legal authorities etc. The complainant may choose to communicate to MARI through any of the following channels / modes:

- **Written (communication – Letter) and deposit the same in the Complaint box provided at the Administrative Office / field office of MARI**
- **Written Communication (Letter) posted through courier or regular or registered post to the communication address of MARI**
- **Mail to the E-mail id: [poshic@mari-india.org](mailto:poshic@mari-india.org)**
- **Call to the phone number (Safeguarding Focal Person): 9392131114**

The Complaints received as above shall forthwith be entered in the Register and action initiated. Full confidentiality shall be maintained as regards the contents of the complaint and the Report/findings; the name of the complainant and the accused etc., to the extent possible / feasible, so that the same is not prejudicial to the interests of various parties / stakeholders

**MARI PERSONNEL** defined as above **shall be obligated to report** any concerns or suspicions of any forms of harassment, abuse and exploitation described above involving ORGANIZATION staff, board members, affiliates, partners, program participants, suppliers, service providers or aid workers associated with another organization, through any conceived mode of channel of communication. MARI shall ensure communication is systematic throughout project planning; and community-based feedback, complaints and response mechanisms are available.

All cases (other than those considered frivolous or of less importance) relating to Misconduct, shall be referred to and dealt by a — Special Committee constituted as under

The Executive Director as the Chief Functionary of the organization, shall constitute a committee (hereinafter referred to as —**Special Committee** or **Internal Committee** established under the mandatory law related to prevention of sexual harassment of women in work places) comprising the senior representatives from staff members working in different locations, ( representing Executive Director and other Directors / Project Managers etc.) and Employees’ Representatives, besides any professional/s, if considered necessary. In times of exigencies, the composition may not be as laid down above, but justification for the deviation is to be recorded. Where any allegation of corruption is made during the duration of the working of the Special Committee, with respect to any executive committee member or managerial personnel or staff member comprised in the Special Committee, he or she shall seek reclusion from continuing as a member or in the alternative, be expelled through a resolution. However, such a person would be eligible to appear before the Special Committee and present his version or defence, whenever called upon, they being provided such opportunity.

The Special Committee shall elect a Chairman / Convenor to preside over all the meetings till the disposal of any matter on hand and shall meet so often as is required, depending upon the urgency and importance of the matter and the convenience of the members of the committee

The Special Committee shall follow principles of natural justice in letter and spirit. It shall provide all reasonable opportunity to the accused, to place his submission, arguments or pleadings.

All the proceedings of the Special Committee shall be recorded / documented through minutes. All the decisions arising out of the proceedings at each of its meeting shall be formalized through resolutions passed with simple majority

The Special Committee may resolve (if so necessitated or considered appropriate, having regard to the given circumstances) that the organization may seek legal counsel for the issues on hand.

The Special Committee shall be guided to decision by most of the committee members. If necessary, secret ballot would be held to ensure free expression of opinion of the committee members, in arriving at a decision.

The Special Committee shall collect all the evidences, witnesses, investigate in a fair and impartial manner and pronounce its verdict and / or award the punishment to any employee, based upon the deliberations, discussions, findings and decision of most of the Special Committee Members.

The Management would award the punishment, depending on the severity of the offence or violation of the Policy. The various forms of punishment include (but not limited to) verbal warnings, written warnings, transfers, withhold of increments, mandatory training or counselling, suspension or termination of employment. Serious misconduct such as sexual abuse and exploitation as well as persistent and severe forms of harassment would justify immediate termination, in line with local labour law (after giving due opportunity or affording legal counsel to defend the accused’s case)

Pursuant to the verdict of the Special Committee, the accused if found guilty, would be removed from service forthwith or placed under suspension, if further investigation is considered necessary based on the severity of the offence. Likewise, the victim shall be liable to be removed from service, if her complaint was found to be frivolous, vexatious, ill-motivated, without substance or untenable.

Further, violation of Code of Conduct Policy, may result in the dismissal of the employee, depending upon the severity of the damage caused by the employee’s misconduct, resulting from the nature of act or omission –

civil or criminal, besides rendering him liable for making good the loss sustained by the organization and also for prosecution, if the misconduct is attracted by any Penal Act passed by the Constitution of India.

**CAVEAT:** Under no circumstances, would any of MARI’s staff assess or investigate an allegation or a reported allegation on his own, outside of standard reported protocols. The Management of MARI shall follow-up and investigate all safeguarding reports according to its investigation procedure and legal and statutory obligations.

Waiver or remission of punishment at any time with respect to any employee, shall be the unquestionable / unfettered prerogative of the Management of the Organization and in all such instances, the same shall not be an admissible plea (for whatever reason) as regards any repeated offence by the same employee nor does it constitute a ground for waiver or remission of punishment to any other employee, whether relating to similar offence or otherwise. Also, waiver or remission of punishment for one of the acts of the employee (wrong doer / accused / subject), shall not be an admissible ground of plea for seeking similar relief, as regards the punishment for other acts of the same employee.

The provisions of any Governing Act relating to any contents mentioned hereinabove (to the extent that the provisions of this Policy are in conflict with such provisions of the Governing Act) shall have overriding effect and this Policy shall be deemed to have contained those governing provisions or this Policy would be deemed to have been amended to that extent, with the result that such incoherent provisions in this Policy would be deemed to have never been included in this Policy, having regard to the Principle of Severability.

Notwithstanding any of the provisions contained in this Policy, where any Donor requires any furthermore aspects or provisions and / or any of the existing provisions to be amended and be considered as Safeguarding Provisions to be adhered by MARI, then in all such instances, MARI shall adhere to such additional provisions or deemed ( amended ) provisions, as though the same were originally contained in this Policy or in the alternative, effect amendments to this Policy, as may be considered necessary and feasible, having regard to the nature or importance of such provisions / aspects ; tenure of the Project ; volume of the Grant etc.

The management may review the contents of this policy from time to time and cause amendments, in case the same are necessitated and in the interest of the Organization. **All the employees or affiliates submit an undertaking to the following effect:**

**I,..... have read, understand and agree to the terms and conditions given in the Code of Conduct. I understand any action from my side in contradiction to the polices, guidelines or code of conduct given by MARI may result in termination of my contract with MARI and their contract with any other agencies MARI works with.**

**Name:**

**Position:**

**Date:**

## Section 3

### Incorporating Safeguarding Clauses in Contracts & Agreement

**Applies to:** [all Service providers, Contractors, Suppliers, Sub-recipients & partners]

**Created On:** February 2025

**Next Revision Date:** August 2025

#### ***Safeguarding Clauses for suppliers & service providers***

To be included as a section in all the contracts & agreements MARI enters with the suppliers, service providers and sub-recipients.

#### ***Template***

The supplier/service provider must prohibit all forms of exploitation and abuse within their organization, including by their staff and affiliates. This includes sexual misconduct, sexual harassment, sexual abuse and sexual exploitation, child labor and trafficking of persons, non-sexual harassment, abuse of position and should not have any conflict of interest in providing supplies or services required by the organization. The organization agrees to take reasonable measures to prevent and respond to such matters, should they arise. The supplier/service provider must immediately report any concerns or suspicions of any forms of abuse or exploitation through any of the following channels:

- Walk in to report to the Director, MARI
- Mail to the E-mail id: [admin@mari-india.org](mailto:admin@mari-india.org) / [mariwgl@gmail.com](mailto:mariwgl@gmail.com) /
- Call to the phone number: 040 – 48543830 / 9392131114 (Safeguarding Focal Person)

Following the reporting of an alleged safeguarding violation, the supplier/service provider will fully cooperate with MARI to undertake any investigative or corrective actions MARI deems appropriate. Failure to comply with this provision may result in termination of this Agreement without penalty to MARI.

#### ***Safeguarding Clauses for Sub-recipients***

To be included as a section in all the contracts & agreements MARI enters with any sub-recipients or partners. The sub-recipient to have a safeguarding policy clause as equivalent to MARI or to agree to adopt/follow the safeguarding clauses practiced by MARI.

#### ***Template***

The sub-recipients or the partners must adopt and comply with MARI's Safeguarding Compliances as given in these guidelines or equivalent to the safeguarding clauses adopted in relevant policies. In addition to complying with any donor required reporting, they must immediately report to:

- a. MARI via walk-in to report to the Director, MARI,
- b. Mail to the E-mail id: [admin@mari-india.org](mailto:admin@mari-india.org) / [mariwgl@gmail.com](mailto:mariwgl@gmail.com) or
- c. call to the phone number: 040 – 48543830 / 9392131114 (Safeguarding Focal Person)

- any credible:
  - a) allegations involving abuse and/or exploitation—including trafficking of persons, forced or child labor—that relate to programming or staff funded by *MARI* and
  - b) allegations that are not directly related to programming or staff funded by *MARI* but could be reasonably expected to impact the relationship between the subrecipient and *MARI* or the reputation of the subrecipient or *MARI*.

Following the reporting of an alleged safeguarding violation, the subrecipient will fully cooperate with *MARI* to undertake any investigative or corrective actions *MARI* deems appropriate. Failure to comply with this provision may result in termination of this Agreement without penalty to *MARI*.

## Section 4

### Guidelines on Safe Recruitment Measures

**Applies to:** [all staff, labors, Interns, Volunteers, consultants]

**Created On:** February 2025

**Next Revision Date:** August 2025

The two safe recruitment measures to be included in recruitment processes are safeguarding reference checking and self-declaration. The two templates to be filled in and maintained in the personnel file of the candidate/staff are provided below.

#### **Safeguarding reference checking questions**

Insert/add these questions into your current reference check template and ensure all safe recruitment practices adopted are in line with local legal requirements.

1. During the period of employment, has this candidate been the subject of a substantiated misconduct (proven/confirmed) investigation concerning harassment, exploitation or abuse? Yes/No
2. Has the candidate been the subject of disciplinary action in relation to harassment, exploitation or abuse? Yes/No
3. If YES to any of the above, please provide the nature of the misconduct and any disciplinary action taken.

#### **Safeguarding Self-Declaration form**

The selected candidates complete a safeguarding self-declaration form prior to signing an employment contract.

1. Have you ever been the subject of a substantiated misconduct investigation concerning harassment, exploitation or abuse?

No  Yes

If you answered yes to the above, please explain.

2. By continuing with this application, I declare that the above information is accurate; if the present offer of employment is confirmed, I will notify MARI should there be changes to the information I have indicated on this form.

Please initial:

3. By continuing with this application, I am providing MARI consent to verify with my previous employers that the information I have provided regarding previous substantiated misconduct is accurate.

Please initial:

4. I understand that any misrepresentation or wilful omission of facts on this form—regardless of when discovered— may be cause for dismissal.

Please initial:

I confirm that the information I have provided is true.

Candidate's Signature:

Date:

Candidate's Name:

Position:

## Section 5

### Introducing Mandatory Safeguarding Orientation

**Applies to:** [all staff, Service providers, Contractors, labors, Interns, Volunteers, Affiliates, Visitors]

**Created On:** February 2025

**Next Revision Date:** August 2025

Safeguarding orientation to be included in all staff induction programs. A yearly refresher course will be a best practice or can be included as a discussion point in staff meeting.

Orienting staff and affiliates on an organization's safeguarding obligations serves as a critical prevention measure. It will ensure that all staff and affiliates are aware of their rights and obligations related to safeguarding. It also discourages inappropriate behaviour and potential misunderstandings by clearly explaining prohibited conduct and the consequences of such conduct and empowers witnesses and survivors to report safeguarding concerns. Finally, it fosters a work environment that is free from harassment, abuse and exploitation. MARI introduces mandatory orientation to all staff, affiliates including Board Members as a part of the introductory orientation.

The mandatory orientation session must, at minimum, include:

- Scope of relevant policies (to whom and when they apply)
- Prohibited staff conduct (including workplace harassment) and abuse and exploitation of program participants and community members
- Mandatory reporting requirement
- Explanation of how/to whom staff can report safeguarding concerns
- Potential disciplinary measures of substantiated (established and proven) safeguarding misconduct

In MARI, no staff or affiliates will interact with community or program participants before undergoing a safeguarding orientation. The safeguarding focal point will provide the orientation on safeguarding as a part of the onboarding process and within 40 days of joining MARI. However, the accountability to ensure safeguarding orientation for all staff, consultants, interns or volunteers associated with each project will be with the respective project in-charges/ reporting officers. **All safeguarding orientations provided will be recorded in the specific register maintained for the same. The responsibility to periodically review and update the safeguarding orientation materials will be with the safeguarding focal point. On a yearly basis, MARI will submit a report on the number of orientation sessions organised and staff and affiliates attended to its Governing Board.**

Refer for the guide to the contents of the safeguarding orientation PPT in annexure 1

## Section 6

# Roadmap for setting up a Feedback Complaints and Response Mechanisms in the Community

**Applies to:** [all staff, Service providers, Contractors, labors, Interns, Volunteers, Affiliates, Visitors]

**Created On:** February 2025

**Next Revision Date:** August 2025

**Feedback Complaints Response and Response Mechanisms (FCRM)** are rather complex in terms of technical aspects of receiving, managing and responding to different types of feedback including safeguarding concerns. This includes receiving feedback from program participants, learning about the program quality, acting on feedback to either improve program quality or respond and act upon complaints. FCRM will help to improve the program quality by contributing to timely learning and that the learning is considered in decision making and plays a crucial role to protect program ensuring participants by responding to safeguarding allegations and reducing the risk of harm.

The FCRM is a comprehensive reporting system that allows the community to provide diverse feedback, including safeguarding concerns, regardless of the status of specific projects or activities. While implementing the FCRM mechanism, MARI is committed to the principles of confidentiality which have significant influences on data security and safety, non-retaliation, and zero-tolerance for misconduct. This entails restricting access to sensitive information about safeguarding complaints and adopting a need-to-know basis approach about all concerns reported. To manage safeguarding complaints effectively, MARI already have clear protocols established that prioritize confidentiality, and the safety of all parties involved.

MARI will also invest in efforts to publish about the **Sexual Exploitation, Abuse and Harassment (SEAH)** prevention mechanism, reporting channels, confidentiality and non-retaliation commitment. MARI acknowledges that fostering an understanding about them is as vital to build trust in the FCRM system and can result in increased willingness to provide feedback. The different types of complaints expected are given in the below table.

	CATEGORY	DESCRIPTION
PROGRAMMATIC	1. Request for information	Questions about current project activities, services and eligibility, or about the organization.
	2. Request for individual project support	A request by an individual for project services that have not been supplied due to a potential targeting error or larger access issue.
	3. General suggestions for service and program improvements	Feedback on relevance, quality and appropriateness of services and programming. A request to change how support is provided in current or future projects.
	4. Appreciation of services or support	Appreciation of current activities or support provided.

SENSITIVE	5. Any alleged violation of the Code of Conduct/ Safeguarding Policy	An allegation of misconduct involving staff (including interns, volunteers, partners, vendors and suppliers or other aid workers); this includes safeguarding issues, harassment, abuse or exploitation, fraud or misuse of project resources and unprofessional behavior.
	6. Other protection issues	An allegation of exploitation or abuse that does not involve staff, partners or other aid workers, or an allegation of protection concerns affecting the communities we support.
	7. Safety and security	Information related to the safety or security of staff, offices or goods—including communities.
OTHERS	8. Out-of-scope feedback	A request for support not provided by the project.

### Establishing Reporting Channels

MARI is dedicated to creating accessible reporting channels for the community, ensuring that individuals can provide feedback or complaints without barriers related to language, age, gender, sexual orientation, caste, physical ability, faith, literacy, or cultural background. The complainant may choose to communicate to MARI through any of the following channels / modes:

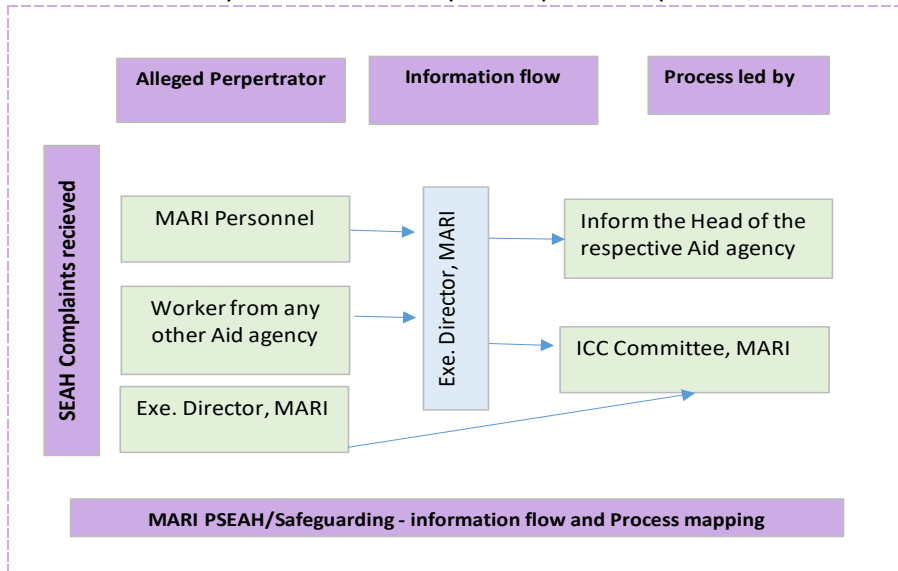
1. Written (communication – Letter) and deposit the same in the Complaint box provided at the Administrative/ field offices of MARI
2. email sent to dedicated email id: [admin@mari-india.org](mailto:admin@mari-india.org) / [mariwgl@gmail.com](mailto:mariwgl@gmail.com)/ [poshic@mari-india.org](mailto:poshic@mari-india.org) and all the sexual harassment and exploitation related complaints should mandatorily be sent to a special mail address [poshic@mari-india.org](mailto:poshic@mari-india.org)
3. Telephone / hotline Number: **040 – 48543830/ 9392131114**

### Publishing the Safeguarding Messages

MARI will ensure that key safeguarding messages are communicated to both within the institution, project participants and communities. **During the meetings for the participants, they will be informed about safeguarding concepts, reporting channels, non-retaliation and zero -tolerance towards cases. Additionally, posters will be displayed in offices and sub-offices. All MARI personnel will receive a mandatory safeguarding orientation.**

### Handling the Safeguarding Concerns/Complaints

Community can report any concerns including sensitive/safeguarding concerns through the reporting channels set above. All concerns other than sensitive/safeguarding concerns will be entered in a FCRM register maintained at the MARI project office. The FCRM register template is provided in annex 1. But, when a **Sexual Exploitation, Abuse or Harassment (SEAH)** complaint or any complaint of sensitive nature comes in, **the information will be sent to the Executive Director, MARI or to a designated Safeguarding Focal Person through the designated channels mentioned above.** If the information is shared by the staff or affiliates, they are to be reminded about the confidentiality and non-retaliation policy. If required, office can inform them about these confidentiality and non-retaliatory aspects in writing to them. Similar is the case with the staff members that they are also bound by these practices/policies/values. If required, this can be in the form of



an agreement between the office and the staff members who come forward to report Safeguarding Concerns.

In general, an acknowledgement to the feedback, complaints or response will be given within 24 hours after receiving it. For all non-sensitive issues, later to the acknowledgement, a response to the feedback, complaints or response to be completed within 30 days. All issues reported in the feedback register can be

attended from the field/project office too, unless requiring consultation with senior authorities. Once a sensitive safeguarding issue is registered then, all activities within this process are carried out according to established investigation procedures/guidelines, ensuring timely and effective responses to reported incidents.

### Anonymous complaints

Anonymous complaints are complaints in which the victim/complainant is not known. As a good practice MARI, will investigate anonymous complaints, if there is sufficient background information and/or good leads to witnesses who can give strong testimony about the alleged abuse. MARI will treat anonymous complaints seriously because of the potential to prevent future abuse and harm, and MARI's responsibility to create a safe and abuse--free environment.

### Malicious complaints

Mandatory reporting mechanisms provides open option for the staff to whistle--blowing issues which are against the organizational policies and its development. MARI is aware that a safeguarding reporting mechanism with a wide berth can prompt intentional complaints, falsified witnessing and misleading information. This necessitates sharing a clear information to the staff that all reporting will be investigated and any attempt to give misleading or falsified information is a misconduct and ground for dismissal. False complaints and conspiracies involving mala fide allegations are deliberate acts of deception aimed at harming an individual or entity's reputation, standing, or well-being. Such actions often stem from malicious intent, driven by personal grudges, financial motives, or the desire to gain an unfair advantage.

### Responsibility & Accountability

In MARI, head of the institution is accountable for the overall effectiveness of FCRM. During the annual general body meeting, MARI will provide an account of the complaints received through the FCRM and the time taken to solve the issues, and a classification of the issues reported.

## Annexure 1 FCRM template

S. No.	Type of feedback system 1. Phone call 2. Feedback box 3. Feedback register (Community meetings)	Location	Date of feedback received (DD/MM/YYYY)	Feedback provided	Category of feedback 1) Request for information 2) request for individual project support 3) suggestions for service and program improvements 4) appreciation of services or support 5) complaint about services or support 6) Violation of organizational code of conduct, ethics, Safe guarding policy, safety and security concerns 7) out of scope (Non-programmatic) feedback	Does the feedback person request to be anonymous	Name (if not anonymous)	Mobile number from which the call came (This column to be filled if feedback system was phone/mobile number)	Mobile number on which response is to be provided after taking action	Gender (Keep blank if anonymous)	Date of response provided	Response provided	Who provided this response (Animator/Facilitator, Administrator, Director)	Was this response to the individual or group	Additional Information (optional)
		a. Block b. Hamlet/Village													

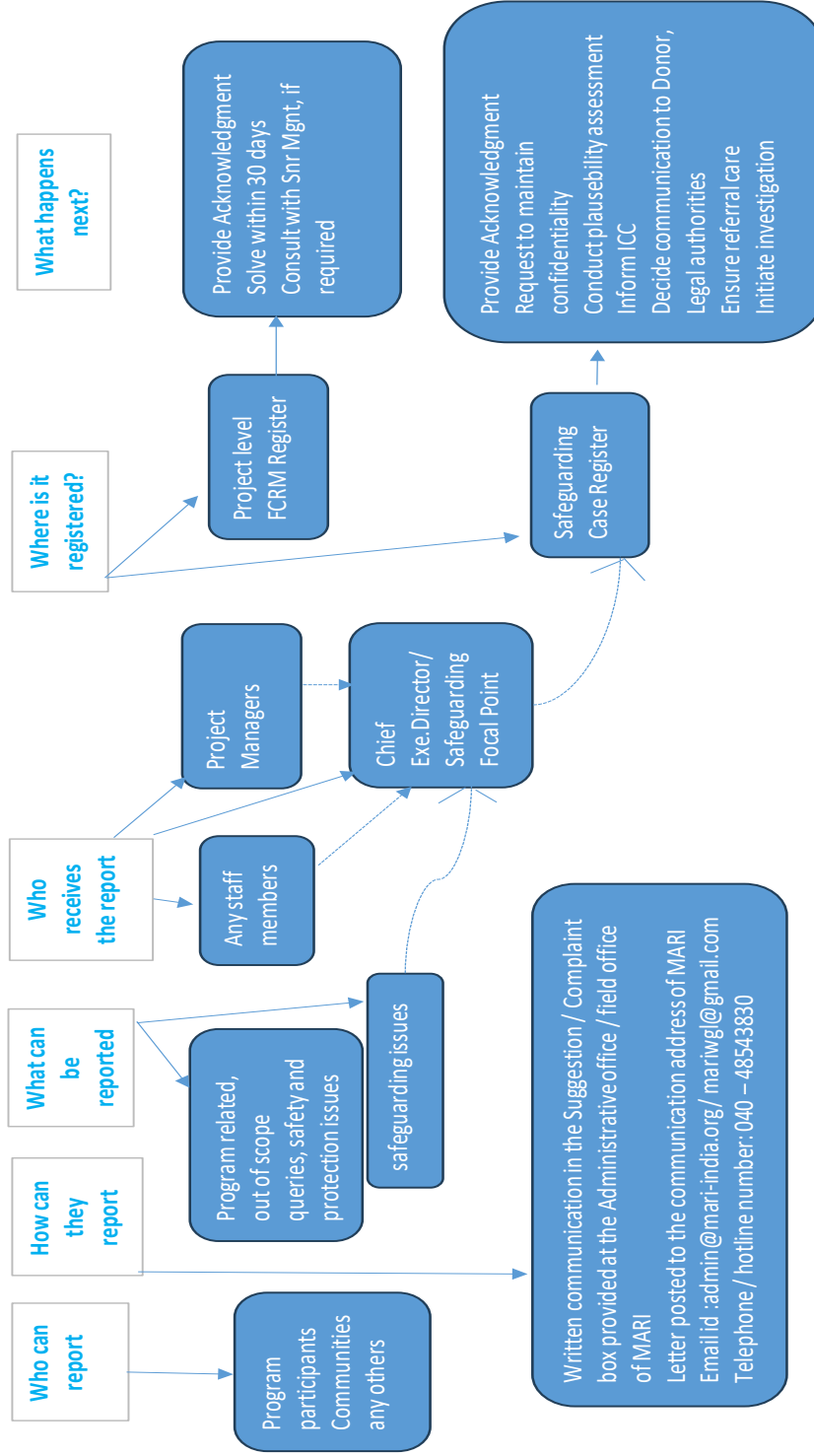
## Annexure 2 Reporting to other agencies template

Reporting on..... (date)..... from MARI,... (full address) to the agency.... (name of the agency) ..... via email/post .....the case number ..... The details are:

-----

-----

## FEEDBACK COMPLAINTS REPONSE MECHANISMS (FCRM)



## Section 7

### Guide on Mapping Essential Referral Services for Safeguarding (SEAH) Survivors

**Applies to:** [all staff, Service providers, Contractors, labors, Interns, Volunteers, Affiliates, Visitors]

**Created On:** February 2025

**Next Revision Date:** August 2025

As a part of introducing safeguarding initiative in MARI, the referral services are identified to provide quality and timely support services to the survivor of safeguarding violation. MARI will adapt a survivor-centred approach in delivering the services to them by following four major principles of **confidentiality, safety, non-discrimination and respect**. This means, though we offer support to access key services to the survivors that could aid in their recovery from a safeguarding incident; it is the survivor's choice to access services or not. It is considered that access to medical/health services within 72 hours after an incident can help prevent certain harm. Similarly, quick access to psychosocial support can reduce the long-term impact of traumatic events. Legal support can help a survivor understand their rights and Social Protection Services (e.g., safe shelter) can help prevent further harm.

Through the identified survivor assistance, MARI is taking appropriate steps to address and mitigate any harm caused, should there be a risk/allegation that someone representing our organization has harmed someone in the course of their work. In a context like this, it is important to have the contact details of the relevant service providers. Staff can also provide the survivor with the contact details of the relevant service providers.

To operationalise the referral mechanism, herewith, guidance is provided on periodic mapping of referral services, review of the mapping process, creating linkages with government services and making referral services.

#### **Developing a mapping and referral protocol of essential services for survivors**

Check whether a mapping of essential services for survivors already exists in your operational area. This may also be referred to as **the "GBV service mapping or referral pathway."** You may find this information by:

- contacting the agencies working in the GBV and/or Protection Cluster
- GBV Working Group, alliance or network (e.g. led by the Ministry of Health, Ministry of Women & Child Welfare)

If a mapping of services already exists, enter data into the template attached (Annexure 1). It is advisable to contact relevant other private sector agencies that work in the area and consult with them on available and appropriate services for survivors in the area and enter data into the template. The safeguarding focal point can write a letter or email or make a telephonic call to identify about the details of the services with other agencies. The services to be mapped are health, mental health, legal, shelter and protection (includes child protection).

#### **Linkages with the government agencies**

Apart from identifying the social service systems available in the private (corporate and social sector), it is advisable to contact the ICDS supervisor, Childline and/or Child Welfare Committee, District legal aid officer/para-legal worker, Women officer in the nearest Police station, counselling services under the District HIV/AIDS Control program and the district level medical care facility (including mental health) to identify the support systems offered by the government mechanism. In India, all the above institutions are involved in providing social care services.

## Periodic review and information sharing

It is important to periodically verify the referral institutions and the subsequent information and **ideally after every 6 months this to be verified.**

- In case the mapping is outdated, verify existing services by contacting individual service providers.
- Periodically update mapping (in emergencies it may need to be updated more frequently)

The entire process of mapping and periodic review of mapping services will be under the guidance of the head of the institution. On a yearly basis, the President of MARI to review the appropriateness and relevance of the support agencies identified and will be part of the annual organizational review process.

## Incorporating referral services in MARI

Whenever MARI initiates a project or activities in a new location, mapping of referral services will also be part of the initial survey of the location. **The safeguarding/PSEAH officer / Convenor ICC of MARI, will be responsible for finalising the referral services for health, social, legal, and social protection services for the staff and community.** The identified referral services will be a part of the safeguarding orientation to the staff in the project/ location. All the identified referral services will be displayed in a public space for the reference and public viewing in all the offices of MARI. and will be periodically updated.

## How to make referral services

As soon as a safeguarding violation is identified/reported, the survivor needs to be offered with the referral services.

### 1. Getting consent

- You must get informed consent from victim/survivor before making a referral and respect their wishes
- If the survivor is a child, then you must receive the consent of the parent/legal guardian
- In short, you cannot make a referral without explicit consent by the survivor, EXCEPT when: a) there is threat to the life of a survivor, b) When a survivor threatens to cause serious harm to another person and c) In case of suspicion of abuse or neglect towards a child and the referral is in the child's best interest.

### 2. Confidentiality and data protection

- You must maintain confidentiality: this means you must use secure means to share information and only share information with others on a 'need to know' basis.
- Ensure any documentation related to the referral is securely stored.

### 3. Timely referrals

- Following a report of a safeguarding incidents, survivors must be offered support to access key services that could aid in their recovery from the incident/s. It is important to have such information readily available as the timeliness of the referral can have a direct impact on the efficacy of the service provided. For example, evidence indicates that following a critical incident, rapid access to psychosocial support can reduce the long-term impact of the event/s on a survivor's day to day functioning and wellbeing.
- In cases of sexual harassment, sexual abuse / Sexual Exploitation it is important to ensure that survivors are informed about the importance of seeking medical care within **72 hours** and are provided the necessary referral to such services should they wish to access those.

## Conclusion

This abovesaid processes on referral services are to be incorporated in MARI. Whenever the safeguarding policy of MARI is reviewed, the abovesaid referral services will also be reviewed as required.

#### Annexure 1 Template for mapping referral services

1. Services
2. Name of Organisation/Institution
3. Address (physical and postal)
4. Phone number
5. Types/description of services offered
6. Target group and criteria (if applicable)
7. Operation days
8. Operation hours
9. Guidance on how to make a referral. (E.g. if the organisation requests to fill out a referral form, or call before making the referral, etc)
10. Name and contact information of person in charge of referrals (if applicable)

The services mapped in the different service/project locations of Hyderabad, Warangal, Jangaon, Guntur, Kurnool are given below: (attached excel sheet as an annexure)

## Section 8

### Guidelines on Safeguarding Investigation Procedure & Disciplinary Measures

**Applies to:** [all staff, Service providers, Contractors, labors, Interns, Volunteers, Affiliates, Visitors]

**Revised On:** June 2026

**Next Revision Date:** June 2027

This section details the broad steps/procedures to be adopted for conducting a safeguarding investigation, disciplinary measures and the safeguarding case register to be maintained at MARI. Though the procedure is an administrative affair, MARI to seek legal consultation as necessary throughout the procedure. The investigations are to be conducted by a trained investigator. Any deviation from the set procedure to be recorded with explanations.

## Investigation Procedures

### Purpose

This procedure outlines the key steps to be followed when undertaking safeguarding investigations. Adherence to this procedure will facilitate due process, transparency and consistency and therefore foster trust in **Modern Architects for Rural India processes**.

### Scope

This procedure applies to all safeguarding misconduct investigations undertaken by **Modern Architects for Rural India (MARI)**

### Procedure

All deviations from the procedure set out within, must be documented and approved by **Executive Director of MARI and placed in the relevant case file**.

#### 3.1 Receipt and escalation of safeguarding allegation

Safeguarding allegations must be escalated to Modern Architects for Rural India - *Safeguarding Focal Point*<sup>1</sup> **within 24 hours of receipt, or sooner, depending on the gravity of the case**. The allegation must be documented on the [Safeguarding Incident Report Form \(Annex 1\)](#) by MARI Safeguarding *Focal Point*. The staff member who reports the case must keep information concerning the safeguarding allegation **confidential**.

*MARI Safeguarding Focal Point* ensures the survivor is **referred to any necessary support services (medical, psycho-social, legal, etc.)**, using the *Essential Services Mapped and regularly updated once in 6 months or as decided by the Internal Complaints Committee (ICC) and approved by the Executive Director*.

**All reports** received by/via *MARI Safeguarding Focal Point* are recorded in the [Safeguarding Report Register \(Annex 2\)](#) and **assigned a case number**.

*MARI Safeguarding Focal Point* ensures that *MARI Executive Director and ICC members* are informed of the allegations within *one business day* or sooner, depending on the gravity of the case.

If *MARI Executive Director, ICC members or Executive Board Members* are involved in the case, they are not to be notified of the allegations at this time; instead, *Safeguarding Focal Point* should be notified and *Safeguarding Focal Point* informs the Chairman, Executive Board/Presiding Officer, ICC, MARI within *one business day* or sooner, depending on the gravity of the case.

---

<sup>1</sup> Throughout this document, a Safeguarding Focal Point is considered to be a member of the organization who is assigned the responsibility of receiving safeguarding allegations and providing support to the investigation process.

## 3.2 Credibility/plausibility assessment

Within *one to two* business days of receipt of the allegation, *MARI Safeguarding Focal Point* determine if the allegation/s is/are plausible and therefore warrants an investigation. When assessing plausibility, consider if there is enough information to:

- identify a subject(s) of the allegation
- determine that if the alleged conduct were found to be true, it would constitute a violation of the organization's policies
- reasonably believe that the subject of the allegation could have had access and opportunity to commit the allegation

### **If the allegation is deemed plausible:**

- *MARI Internal Complaints Committee* assesses immediate risks, including safety, security and well-being concerns of all affected parties and documents the identified risks on the [Investigation Risk Management Plan \(Annex 4\)](#)
- *MARI ICC* completes referrals for support services (medical, psycho-social, legal, etc.) for all affected parties, using the Essential services mapped in the locations of Warangal, Guntur, Kurnool, Hyderabad and Jangaon. *MARI* also will ensure that the essential services are updated and mapped for other locations from time to time depending on the need.
- In consultation with the *MARI ICC Committee*, *MARI Safeguarding focal point* reports the allegations to affected donor(s) using the [Donor Reporting \(Annex 5\)](#) template. This also depends on the Safeguarding policies and practices of the respective donors and the agreement reached with them in this regard.
- *MARI Safeguarding focal point* documents the completion of the above steps on the Safeguarding Report Register
- *MARI Safeguarding focal point* informs the reporter/survivor that a safeguarding investigation will occur and subsequently verify this information was shared.

### **If the allegation is deemed implausible:**

- *MARI Safeguarding Focal Point* documents the implausibility assessment outcome on the [Credibility Assessment Form \(Annex 3\)](#)
- *MARI Safeguarding Focal Point* updates the Safeguarding Register
- *MARI Safeguarding Focal Point* informs the reporter/survivor that
  - a safeguarding investigation will not occur
  - any other follow-up planned
- *MARI Safeguarding Focal Point* will confirm that the above information was shared with the reporter/survivor

## 3.3 Survivor-centred approach

The survivor's needs and interests must be at the forefront of the investigation process. The survivor has the right to decide to participate in the investigation or not. **An investigation can also proceed without the survivor's consent<sup>2</sup> but only after due consideration for the potential impact of the investigation on the survivor's safety and well-being.** Such safety and security considerations must be clearly documented in the [Investigation Risk Management Plan \(Annex 4\)](#) and regularly updated by *MARI Safeguarding Focal Point*.

---

<sup>2</sup> The consent form to briefly mention the background info of the survivor, case number, brief details of the investigation procedure that will be followed, limitations to confidentiality, availability of referral care and its limitations, limitations in investigations, consent to give interview, periodicity of investigation briefing and obligations to the law of the land. The form to be signed and dated and can be customised as per the need of each investigation.

- *MARI Safeguarding Focal Point investigator/individual assigned by the Executive Director* will **inform the survivor of the investigation process**, including how the information they have shared will be used.
- *MARI Safeguarding Focal Point investigator/individual assigned by the Executive Director* will **confirm if the survivor intends to participate in the investigation process and the nature of their participation**.
- Should the survivor wish to receive such information, *MARI Safeguarding Focal Point investigator/individual assigned by the Executive Director* will provide the survivor with regular updates regarding both the progress of the investigation and the outcome of the investigation (substantiated or unsubstantiated). **The frequency of the updates should be reflective of the gravity of the case but should occur no less than every two weeks**, unless the survivor states that they prefer to receive the updates less frequently.
- In the case of a child, *MARI Safeguarding Focal Point /individual assigned by the Executive Director* will consult the child’s guardian or other appropriate responsible adult to obtain the child’s views, wishes and to adequately plan for their safety and well-being needs.

### 3.4 Planning the investigation

Investigations must be completed in a timely manner reflective of the gravity of the concerns. High-risk cases—including but not limited to instances where violence has occurred—should commence within 72 hours of having received the allegation.

- *MARI ICC Presiding Officer* **appoints the investigation team** and the *MARI Safeguarding Focal Point/individual assigned by them* **prepares/updates the Terms of Reference** for the investigation team.
- The investigation team sign the [Investigator Terms of Reference \(Annex 6\)](#), and *MARI Safeguarding Focal Point* ensures all signed Investigator Terms of References are saved/stored with the case file.
- *MARI Safeguarding Focal Point* continues to update the [Investigation Risk Management Plan \(Annex 4\) throughout the investigation planning phase](#).
- The investigation team prepares an [Investigation Plan \(Annex 7\)](#) **within 3 business days or one week** of the decision to investigate. *MARI ICC Presiding Officer* approves the investigation plan within *4 business days or one week* of receipt.
- *MARI ICC Presiding Officer* decides on interim measures for the subject of the investigation, pending the investigation outcome. Potential interim measures include *administrative leave, etc.* Such a decision will be informed by:
  - if there is information to suggest that the conduct of the subject of the investigation would pose a danger to other personnel or to the organization
  - the subject of the investigation is unable to continue performing their functions effectively, in view of the ongoing investigation and the nature of those functions
  - continued service by the subject of the investigation would create an unacceptable risk that they could destroy, conceal or otherwise tamper with evidence, or interfere in any way with the investigation or with the proposed project implementation plans or project impact in any manner.
  - local labor laws
- *MARI Safeguarding Focal Point* drafts the Subject of the Investigation Notification Letter.

### 3.5 Evidence gathering

- Evidence collection, including all interviews, must be completed within *20 business days* to one month of the commencement of the investigation.
- The investigators ensure all interviewees sign the [Confidentiality Form \(Annex 14\)](#) prior to interviews.
- The investigators read the [Interview Preamble \(Annex 13\)](#) at the beginning of all interviews.
- The investigators record responses to interview questions on the [Record of Interview Template \(Annex 9\)](#).
- The investigation team provides case updates to the *ICC MARI Presiding Officer* as required and on *weekly* basis. The updates include:

- changes to the [Investigation Risk Management Plan \(Annex 4\)](#)
- additional support needs (access to documents, arranging interviews, interview cooperation, funds to provide transportation for witness, etc.)
- additional interviews planned
- emerging operational and reputational risks for the organization
- requests for any other additional support needed based on new information learned

### 3.6 Informing the subject of the investigation

*MARI Safeguarding Focal Point* informs the subject of the investigation about the investigation process, any interim measures put in place and provides the subject of the investigation with the [Notification Letter \(Annex 8\)](#). This should be done after taking all precautions and confirmed in writing that the safety of the survivor is fully taken care of.

The subject of the investigation is informed of:

- the nature of the allegations and the relevant alleged policy breach
- confidentiality requirements
- consequences for retaliation or confidentiality breaches
- steps in the investigation process
- interim measures (as relevant)

#### **The interview style:**

Interview of any of the concerned individuals should be properly planned with specific strategies/approaches/questions:

- The investigators should be non-judgemental
- In case it is required allow the participants to keep quiet
- In case the survivor overwhelms with emotions, allow him/her time to do so
- Ensure that the investigator do not ask questions that lead answers and do not respond that what has been explained by the survivor//witness/subject is not possible to happen
- Make note of all the expressions to the extent possible
- Use the services of translators/experts/recorders if required.
- Introduce the persons present during the interview and the purpose for which they are present to the survivor/witness/subject.
- Also get the confidentiality undertaking signed by the other persons present during the interview/investigation.
- It is better to prepare the questions to be asked in advance of any interview and stick to the same.
- Keep assessing the safety concerns, emotional outbreaks if any which need immediate attention.
- Keep assessing whether investigation to continue at any point of time during the interview.
- Respect the decision of the survivor about starting or continuing the investigation at any point of time during the investigation. Top priority should be given to the safety of all the individuals concerned with specific reference to the survivor.
- All the decisions/observations must be well documented and report to the Executive Director of MARI whenever it is certainly required and regularly depending on the gravity or the sensitivity of the case.

### 3.7 The investigation report

- The investigation team shares the draft [Investigation Report \(Annex 10\)](#) in one week of completing the evidence gathering phase of the investigation. The investigation report documents:

- if the allegations are substantiated on the (applicable evidentiary standard required by local labor law – typically the balance of probabilities/more likely than not likely)
- recommended correction action (disciplinary sanctions or systemic changes)
- The subject of the investigation is provided with (a summary of the investigation findings) and given an opportunity to respond to the findings. The [Opportunity to Respond Template \(Annex 11\)](#) can be used to facilitate this process.
- *MARI IC Committee* adds a summary of the subject of the investigation’s response to the Investigation Report.

### 3.8 Disciplinary and corrective measures

- *MARI ICC* decides on the appropriate corrective action—reflective of the gravity of the policy violation—and appoints individuals responsible for implementing the corrective action.
- *MARI ICC* and *MARI Executive Director* decide on appropriate systemic (organizational/programmatic) measures and appoints individuals responsible for implementing the corrective measures.

### 3.9 Concluding the Investigation

*MARI Safeguarding Focal Point* informs the subject of the investigation of the outcome of the investigation within **3 days** of receiving the subject of the investigation’s response to the findings. This includes notification of any associated disciplinary sanctions. The subject of the investigation must be provided with an [Outcome Letter \(Annex 12\)](#) at this time.

- *MARI Safeguarding Focal Point* informs the [alleged survivor of the outcome of the investigation](#) (substantiated or unsubstantiated) within **3 days** of finalizing the Investigation Report.
- *MARI Safeguarding Focal Point* informs the donor of the investigation outcome, including any corrective action planned/taken within 3 days of finalizing the Investigation Report.
- *MARI Safeguarding Focal Point* considers and oversees communication to other audiences that may be necessary, depending on the nature of the case.
- *MARI Safeguarding Focal Point* ensures all corrective action/s are implemented.
- *MARI Safeguarding Focal Point* updates the [Safeguarding Report Register \(Annex 2\) with the outcome and case closure date.](#)

## Information Management

*MARI Safeguarding Focal Point* is responsible for ensuring all material related to the case is securely stored. This includes ensuring paper copies of documents are stored in locked cabinets and electronic files are password protected.

## Disciplinary Measures

MARI, in accordance with the labor laws of the country and as per the recommendations of the MARI ICC may take disciplinary actions which can range from a verbal warning to dismissal from the job. Also, if the case warrants, the ICC will recommend reporting to law enforcement services during/after the investigation process. The disciplinary measures will depend on several mitigating and aggravating factors which include evidence of remorse, overall behaviour of the subject during investigation, frequency and history of misconduct, position of power and trust and the seniority of the subject of the investigation. The suggested disciplinary actions include Warning, reduction in salary, immediate Suspension from work without pay, demotion, transfer, adverse remarks in the performance assessment, termination of employment, immediate reporting to law enforcement (for sexual assault and coercion), not provide NOC / Supporting letter or documents, lifetime ban from working in MARI, any other relevant actions. These disciplinary actions are

applicable to MARI staff and affiliates for non-compliance behaviours, including encouraging or condoning acts of harassment, exploitation or abuse or knowingly making false complaints.

## **Safeguarding Case Register**

MARI maintains a confidential safeguarding case register with limited access. Before giving references or recommendations to any staff or affiliates, safeguarding focal point to be contacted confidentially. This document to be referred before/while providing official references/ letter of recommendations.

## Section 5

### Annexure 1 Guide to the contents of the safeguarding orientation PPT

Slide 4 & 5

Plenary discussion

Only show title of slide and ASK: “*What is safeguarding?*” or “*What comes to mind when you hear the term safeguarding?*” or “*How would you describe it in your own words?*”

VALIDATE answers related to “responsibility,” “staff behavior/conduct,” “protection,” “prevention,” “accountability,” etc.

SHOW definition and EXPLAIN that safeguarding is the responsibility that organizations must make sure their staff, operations and programs do no harm to staff, children and vulnerable adults; and that they do not expose them to any form of abuse or exploitation.

Preventing sexual abuse and exploitation (PSEA) and child safeguarding come under this umbrella term.

Slide 6 & 7

SHARE that it is important to understand the difference between safeguarding and protection incidents to understand what issues an organization’s safeguarding system needs to address.

EXPLAIN the slide content by emphasizing the following:

- *Staff harassing other staff is a safeguarding incident.*
- *Staff abusing or exploiting program participants is a safeguarding incident.*
- *Community members/program participants abusing, exploiting or harassing other community members or program participants is a protection incident.*

Slide 8 – 10

Scope of safeguarding

Coverage of safeguarding extends to all persons working in MARI and working for MARI. This is applicable to MARI Board Members, staff, interns and volunteers. All consultants who are using MARI office space also signs the Code of Conduct. If the consultant does not have access to MARI office space or MARI’s program participants or community members, the safeguarding clauses for the Contracts & suppliers will be applicable to them.

All contractors and suppliers who have planned/scheduled interaction with the MARI’s program participants or community members for more than 3 times in a quarter will need to have an orientation about the safeguarding in detail – prohibited behaviours, reporting mechanism and the clauses on non-conditional/consequential withdrawal of contract/ agreement - to be explained to them.

Safeguarding provides protection to all staff and program participants and communities in which MARI is working.

Focus on 1) the difference between protection and safeguarding; 2) that the safeguarding policy applies to all staff and affiliates, including volunteers, interns and vendor staff; and 3) the safeguarding policy applies during and after work hours. (with examples)

## Slide 12-14 Why safeguarding is important

EXPLAIN that there are several external factors that contributed to safeguarding gaining momentum in the aid sector.

### Slide 13

SHARE slide content and EXPLAIN:

- *Larger scale of humanitarian and development projects than 20 years ago*  
CLARIFY that as the organization's interventions have become larger and more wide-reaching, there is naturally more risk, including safeguarding risks.
- *New technologies (internet, cell phones, etc.) create new risks*  
CLARIFY that with easy access to online communication, risks of various forms of prohibited behaviour by staff have increased. This includes, but is not limited to verbal, emotional and sexual abuse via social media and communication platforms.
- *Remote management of program implementation due to conflict, COVID, etc.*  
CLARIFY that remote management is necessary to protect staff in areas affected by conflict, COVID, etc. Consequently, monitoring of program implementation is more difficult. Now there are fewer ways to guarantee that safeguarding measures are established or to know if harm is occurring.
- *Media and public demand more transparency and accountability from NGOs*  
CLARIFY that as the public has obtained greater access to information and greater awareness about aid interventions, they are increasingly interested in how organizations and interventions are protecting communities from harm. They also want to understand the overall quality of the services being provided.
- *Stakeholders have easier access to information on safeguarding incidents (social media)*  
CLARIFY that, as was mentioned earlier, this increases transparency and the public's demand for greater accountability from organizations. At the same time, it creates new risks about safeguarding cases becoming viral, and confidential information about the survivor and others becoming public knowledge. This can cause serious harm to those involved.

### Slide 14

EXPLAIN that due to the previously discussed changes in the external environment, donors' safeguarding expectations have become more rigorous and comprehensive.

HIGHLIGHT that historically, donors required NGOs to have a safeguarding policy/code of conduct. Now donors require evidence that safeguarding policies and systems are in place and are being properly implemented. These policies and systems help prevent and respond to abuse and exploitation.

Moreover, donors require evidence from agencies, such as CRS, that their implementing **partners** have similar systems and policies in place to prevent and respond to abuse and exploitation.

### Slide 15-20

Why safeguarding issues occur?

### Slide 16 - 17

HIGHLIGHT that safeguarding incidents can tell us so much about what systems need to be in place to best protect the people we work with and serve. While considering what systems need to be put in place, we also

need to understand the different vulnerabilities of those we want to safeguard. This is what we will be discussing in the coming slides.

ASK: Why are program participants at risk of abuse and exploitation by humanitarian or development workers? Let participants brainstorm during plenary.

SHARE the slide content and VALIDATE the answers by summarizing that program participants are at risk of exploitation and abuse because there is a power imbalance between humanitarian and development workers and the people we serve. For example, we provide resources and services that program participants rely on.

ADD that, as we can see, vulnerabilities can be related to gender, age and diversities—such as ethnicity, religion and disability.

Those who experience multiple forms of vulnerability—for example, a person who is both female and has a disability – are at even higher risk of exploitation and abuse.

HIGHLIGHT that in addition, people who are already subject to one form of abuse and/or exploitation are at greater risk of additional forms of abuse and exploitation.

SHARE as an example that a working child may be more vulnerable to sexual abuse by his or her employer due to their isolation and dependency on their employer.

Slide 18 -21

SAY: Now that we have discussed some of the reasons that program participants can be at risk of exploitation and abuse, we will discuss why staff and affiliates can also be at risk of harassment. This is an issue that can often be overlooked.

CLARIFY that CRS defines affiliates as interns and volunteers.

ASK: Why are staff and affiliates at risk of harassment by other staff and affiliates?

VALIDATE answers around vulnerability and power imbalances within an organizational context.

HIGHLIGHT that staff in different positions within the organizational hierarchy have different levels of power. Therefore, their risk of harassment can vary accordingly.

ADD that additionally, staff can be at risk of harassment because of belonging to a group with less power — for example: older or younger people, members of a minority group, females, having an irregular legal status, etc.

Understanding how an employee's membership to various groups affects the power dynamics in a workplace is critical to setting up effective safeguarding systems within organizations.

SHARE an example of a cleaning lady who is a single mother, refugee and the sole economic supporter of her family. She is at higher risk of harassment due to her low position in the organizational structure, when compared to a non-refugee, Head of Human Resources woman whose husband also helps provide for their family.

DISCUSS and explain economic dependence on the job as another factor of vulnerability.

CONCLUDE: Power imbalances create a risk of harassment in the workplace. Those with less power—due to their position in an organization or membership to a particular group—are at higher risk of harassment.

Slide 22-24

EXPLAIN that we will now be more closely examining the impact of safeguarding incidents on survivors. This will also help us deepen the understanding of why safeguarding is important from the perspective of the survivors.

PRESENT the slide content and go through the “Impacts on Organizations” content together. ASK/DISCUSS if some of the potential organizational repercussions.

ASK the participants if they can think of any other way organizations have been impacted by safeguarding incidents.

HIGHLIGHT that even when the safeguarding risks are small, the impact on the organizations is very high.

Slide 26-27

NOTE for facilitator: If the number of participants is not sufficient, please combine groups as appropriate.

SHARE that each group will need to **provide two examples** for the following prohibited behaviours.

- *Group 1: Physical abuse*
- *Group 2: Emotional abuse*
- *Group 3: Sexual abuse*
- *Group 4: Exploitation*
- *Group 5: Neglect*
- *Group 6: Prohibited Conduct Toward Children*
- *Group 7: Workplace Harassment*

NOTE for facilitator: Group six is to provide one example for harassment and one for sexual harassment.

Allow 10 minutes for the group work and bring participants back to plenary.

Slide 28-29

SHARE the definition of *physical abuse* from the slide and examples of physical abuse. HIGHLIGHT those that were not mentioned in the discussion.

CLARIFY that non-accidental use of force means that the use of physical force is intended to cause harm. Accidental harm would not be considered a violation of the policy as it was not deliberate. Also, the risk of injury refers to the potential and not only the actual causing of an injury. An example would be that slapping might not cause a bruise as an injury but would still represent a risk of having an injury and therefore be considered a prohibited behaviour.

Slide 30-31

SHARE the slide content with definition and examples of *emotional abuse*. HIGHLIGHT those that were not mentioned in the discussion.

CLARIFY that the definition focuses on persistent behaviour that causes emotional harm. For example, that means that if an inappropriate joke was made only once, it would not be considered emotional abuse.

Slide 32- 33

ASK Group to give examples of sexual abuse. Validate the examples shared.

SHARE the slide content with definitions and examples of sexual abuse. HIGHLIGHT those that were not mentioned in the discussion.

CLARIFY that it is important to highlight that the definition refers to threatened physical abuse of a sexual nature, which means that the actual physical contact does not need to occur for such behaviour to be considered an abuse and therefore, prohibited behaviour.

ADD that this prohibited behaviour also specifically relates to children, defined as anyone under 18 years of age. This is in line with the international standard set by the United Nations and defined in the Six Core Principles for Protection from Sexual Exploitation and Abuse (PSEA) where Principle 1 states: “Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defence.”

Slide 34-35

SHARE the definition of *exploitation* and the key forms of exploitation from the slide. HIGHLIGHT those that were not mentioned in the discussion.

EXPLAIN that in simplified terms, exploitation refers to situations where someone uses their power over another person to get them to agree to something.

HIGHLIGHT that the prohibition of the use of sexual services (prostitution) is also a sector-wide standard addressed in the Six Core principles for Protection from Sexual Exploitation and Abuse (PSEA) and was set by the United Nations. Standard three states: “Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited. This includes exchange of assistance that is due to beneficiaries.”

ADD that child labor is one of the most common forms of exploitation.<sup>3</sup>

CONCLUDE that sexual exploitation and abuse is considered prohibited conduct by the wider sector, as reflected in Principle 1 of the Six Core Principles for Protection from Sexual Exploitation and Abuse, which states: “Sexual exploitation and abuse by humanitarian workers constitute acts of gross misconduct and are therefore grounds for termination of employment.”

SHARE that now we will address *neglect* as a form of prohibited behaviour.

Slide 36-37

ASK Group 5 to give examples of neglect.

VALIDATE the answers and read examples from the slide with the definition of *neglect*. HIGHLIGHT those that were not mentioned in the discussion.

CLARIFY that when talking about neglect, the focus is on deliberate negligence and carelessness in interactions with program participants. An example would be not referring a child or adult program participant for medical care despite knowledge that they require immediate medical care.

Slide 38

ASK if there are any questions or comments regarding the prohibited behaviours toward program participants and community members.

---

<sup>3</sup> On child labor, clarify that the minimum age for hazardous/dangerous work is 18 years of age (e.g., construction work, mining, managing machinery). This means that children 15–17 years of age are only allowed to do light work that does not negatively impact their physical or mental health and *does not interfere with their compulsory education*. Add that consistent with CRS’ values and principles, any child under 18 years of age who is working in accordance with the applicable law (or the ILO, whichever is higher) should be allowed—at minimum—to complete his or her compulsory education).

SHARE that we have now investigated all the types of prohibited behaviour relevant to staff member behaviour **toward program participants and community members.**

ASK if there are any questions related to these types of prohibited behaviours.

SHARE that now we will address *prohibited behaviours* when interacting with child program participants.

ASK Group 6 to give examples of prohibited behaviours when working with children.

VALIDATE examples shared and read the definition of *prohibited behaviours toward children*. EXPLAIN that these prohibited behaviours ensure that interaction with child program participants is solely for the purpose of implementing program activities.

HIGHLIGHT that all previously discussed forms of prohibited behaviours also apply to child program participants. However, since child beneficiaries are one of the most vulnerable groups under an organization's care, there is a need to specifically address prohibited behaviours concerning children.

Slide 39-40

SHARE that we also want to explore harassment, a particular type of prohibited behaviour between staff.

ASK Group 7 to give examples of staff harassment.

Validate the answers and read slide content for harassment. HIGHLIGHT those examples that were not mentioned in the discussion.

REITERATE that Harassment is unwanted, unwelcomed and uninvited behaviour- targeted at an individual or group - that demeans, threatens or offends and results in a hostile environment for the victim

EXPLAIN that Harassment can be a one occurrence and that it includes physical, verbal or visual conduct

HIGHLIGHT that harassment is a form of discrimination and is targeted against an individual or group based on race, ethnicity, national origin, religion, gender, disability, etc.

Examples: Jokes about race or ethnic groups, Derogatory comments about disability, Name-calling or insults related to religion

**OR** opt for Games on the Prohibited behaviours, QUIZ, Classify the events mentioned, what cannot be an appropriate behaviour to the community

Slide 41 – 43

Read the slide from down to top from right to left. Explain what is meant in each box.

MARI has brought in changes to its existing 26 policies (as relevant) to meet the international requirements on safeguarding. This means we have taken effort to bring in same language and coverage for the prohibited behaviours, reporting channels and follow up actions on any cases reported.

Display the templates that are to be included in various activities. Provided in This document session 1, 2 and 3.

Slide 44- 45

How can you report?

Slide 45

What need to be reported?

Slide 46 – 47-48

Explain the different mechanisms – who will receive the report at each end, how much time required to give the response, how to give and who will give the acknowledgement etc. Explain also what will happened to the report received

Slide 49

Malicious reporting- Explain what is malicious reporting, what will happen to the reporting/reporter, if proved malicious?

Slide 50

Disciplinary actions recommended/in suggestion. Mention the aggravating and supportive factors.

Slide 51-52 essential services

How to map and how to access/recommend essential services. Display the current map

Slide 53-56

Role of staff, supervisors/project leaders and management

Slide 57 -58

Question and Answer session & thank you

### **Additional Reading on Safeguarding**

Safeguarding is the **responsibility** of the organization to ensure that **the staff and programs of the organization** honor and protect the rights and dignity of all people—especially children and vulnerable adults—to **live free from abuse and harm**.

A holistic safeguarding policy reflects the presence of functional policies, processes, and systems to prevent and respond to safeguarding incidents against children and adults, specifically to the vulnerable. This necessitates the organization to implement measures to prevent, mitigate and respond to safeguarding incidents if the alleged perpetrator is staff or other affiliates like consultants, volunteers, vendors, service providers. The organization need to develop mechanisms to prevent, and report safeguarding incidents, investigate and take actions where necessary. Safeguarding incidents can occur in any workspace including in the community engaged in by the organization. The safeguarding incidents can be in terms of harassment, abuse, exploitation or prohibited behaviors. Irrespective of the location, all reported incidents are to be investigated and appropriate actions.

### **Importance of Safeguarding Policy**

Few points are noted here to reflect on importance of safeguarding policy for organization working for the community.

### **1: Changing Scenarios of NGO's work / Development Sector**

- The working patterns in development sectors have been changed. Now **large-scale intervention** is being done by many agencies. This helps in reaching more people but may arise some safety issues. This increases the risk factors due to less in person supervision of the implementation
- Existence of power imbalance between the program participants and organization’s representatives
- Similarly, **technological advancement** is a double-edged sword. This helps in managing activities remotely or virtually due to COVID or in some places due to conflict situations. Remote management may be risky for ensuring safety measures to the staff and for the community.
- Now a days, **media** has a close vigil to NGO’s work and public demands are there for more transparency. Role of social media needs special mention here. Similarly different stakeholders have easy access to all information / incidences of the NGOs. Hence safeguarding policy is a need of the hour for smooth function.

## 2. Donor Requirements

- Over the years, the expectation of development sector funders moved from having protection policies or Code of Conduct to having active safeguarding system & processes in place. CRS’ donors are also demanding safeguarding systems to be in place till the last mile. This necessitates all our implementing partners to have the minimum safeguarding standards.
- Donors also require evidence that the Safeguarding Policies and related systems are implemented. Hence, having a policy is not sufficient, how it is being used and monitored is equally important.

### Prohibited behaviours

CRS and its partners are committed to creating and maintaining an environment - in our workplace, in our project and in the communities in which we work – that prevents the harassment, abuse, exploitation of all, with whom we interact and to promote the value of do no harm. The harassment, abuse and exploitation, in all forms as defined below, are the prohibited behaviours while interacting with the co-workers and associates including other service providers. program participants, children, vulnerable adult and community members.

### Harassment

1. General harassment is unwanted, unwelcomed, and uninvited behaviour that demeans, threatens, or offends and results in a hostile environment. Harassment is typically targeted at an individual, or a particular group of individuals. This includes, but is not limited to, harassment based on ethnicity, colour, religion, sex, age, sexual orientation, national origin or ancestry, disability, medical condition, marital status, or veteran status.
2. General harassment is not sexual in nature and may consist of verbal or physical conduct that insults or shows hostility or aversion towards an individual or group of individuals. Some examples of conduct that may constitute harassment (but not limited to) are: (a) the use of derogatory statements, or abusive words or phrases, jokes, unwelcome pranks, slurs, negative stereotyping, or threatening, and other intimidating or hostile acts (b) written or graphic material that insults, stereotypes or shows aversion or hostility towards an individual or group and that is placed on walls, bulletin boards, email, voicemail, or elsewhere on the organization’s premises, or circulated in the workplace; and (c) a display of symbols, slogans, or items that are associated with hate or intolerance towards any select group.<sup>4</sup>

---

<sup>4</sup> Adapted from *US Equal Opportunity Commission*.

## Bullying

3. Bullying, defined as persistent and repeated mistreatment of one or more targeted persons by one or more perpetrators and includes (but is not limited to) threats; intimidation; public humiliation/name-calling; persistent and unwelcome teasing; abuse or use of power to undermine, humiliate or denigrate; intentional work interference/sabotage; or stalking. While harassment is usually based on protected characteristics and may be easier to spot, bullying can occur to anyone and may be more subtle and accumulative.<sup>5</sup>

## Sexual misconduct / Sexual Harassment / Sexual Exploitation / Sexual Abuse

4. Different forms of Sexual misconduct can cross age and gender boundaries and may include unwelcome sexual advances; request for sexual favour; verbal or physical conduct or gesture of a sexual nature; or any other behaviour of a sexual nature that might reasonably be expected/perceived to cause offense or humiliation to another and when such conduct interferes with work; is made a condition of employment; or creates an intimidating, hostile or offensive work environment.<sup>6</sup> Sexual misconduct can be verbal, physical or visual. It includes actions directed at an individual or actions observed by an individual.
  - Verbal sexual misconduct includes requests of a sexual nature made by one person to another. When from a supervisor or superior, these requests may demand or imply a condition of employment or compensation, either implicitly or explicitly, or when an employment decision is based on an individual's acceptance or rejection of such conduct.
  - Physical sexual misconduct includes unwanted or inappropriate leering or touching of any kind, unwelcome sexual advances. Stalking may also be associated with sexual misconduct.
  - Visual sexual misconduct includes the sharing or posting of images that create an offensive, hostile or intimidating environment or interferes with an individual's job performance. Examples include—but are not limited to—displays of sexually explicit or demeaning materials such as offensive pictures, cartoons, symbols, or items in the workplace.

## Exploitation

5. Exploitation is the use of force or other forms of coercion, abduction, fraud, deception, abuse of power or position of vulnerability; or the giving or receiving of payments or benefits to achieve the consent of a person having control over another person.<sup>7</sup>

### Forms of exploitation:

- a. **Sexual Exploitation** is any actual or attempted abuse of 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.<sup>8</sup>

---

<https://www.eeoc.gov/laws/types/harassment.cfm>

<sup>5</sup> Adapted from *Workplace Bullying Institute*: <https://www.workplacebullying.org>

<sup>6</sup> United Nations. *Glossary on Sexual Exploitation and Abuse*, Second Edition, 24 July 2017.

<sup>7</sup> United Nations. *UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, 2004*.

<sup>8</sup> United Nations. *Glossary on Sexual Exploitation and Abuse*, Second Edition, 24 July 2017.

- b. **Child Labor** is work that deprives children of their childhood, their potential, and their dignity, and that is harmful to a child’s physical or mental development. It is work that is mentally, physically, socially, or morally dangerous and harmful to children and interferes with their schooling by:
  - a. depriving them of the opportunity to attend school.
  - b. obliging them to leave school prematurely; or
  - c. requiring them to attempt to combine school attendance with excessively long and heavy work.
- c. Staff and affiliates of the organization are prohibited from hiring children under the age of 15—regardless of any perceived benefit to the child or family—and prohibited from funding programs in which child labour, as defined above, is occurring. Hazardous work<sup>9</sup> is prohibited for all children, including children aged 15-17 years. This includes construction and manufacturing work.

### Abuse

- 6. Abuse is a deliberate act of ill treatment that can harm a person’s safety, well-being, dignity, and development. It often involves individuals who have a relationship of responsibility and care for the victim including project staff, parents, guardians, teachers, community workers, health-care providers, religious leaders, friends, or other children.<sup>10</sup>

#### Forms of abuse<sup>11</sup>:

- a. **Sexual Abuse:** actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.<sup>12</sup>
- b. **Physical Abuse:** Non-accidental use of physical force that inadvertently or deliberately causes a risk of or actual injury or suffering. Physical force includes but is not limited to hitting, shaking, kicking, pinching, pushing/pulling, grabbing, burning, female genital mutilation, torture, and other physical acts.
- c. **Emotional Abuse:** Harm done by persistent or severe emotional ill-treatment or rejection, such as degrading punishments, threats, bullying, and not giving care and affection, resulting in adverse effects on the behaviour and emotional state of an individual or the behaviour and development of a child or young person.<sup>13</sup>
- d. **Neglect/Negligent Treatment:** Allowing for context and resources, the failure to meet the basic physical and/or psychological needs either deliberately or through negligence of a child or individual under the responsibility of the care giver/guardian. Neglect includes but is not limited to failing to provide adequate food, sufficient or seasonally-appropriate clothing and/or shelter; failing to prevent harm; failing to ensure adequate supervision; failing to ensure access to appropriate medical care or providing inappropriate medical treatment (e.g., administering medication when not authorized); or failing to provide a safe physical environment (e.g., exposure to violence, unsafe programming location, unsafe sleeping practices, releasing a child to an unauthorized adult, access to weapons or harmful objects, failing to child-proof a space that children will occupy, etc.).

### Trafficking

---

<sup>9</sup> Hazardous work is work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety, or morals of children.

<sup>10</sup> Adapted from: *Better Care Network; Save the Children and UNICEF.*

<sup>11</sup> Adapted from United Nations Glossary on Sexual Exploitation and Abuse (24 July 2017) and Keeping Children Safe ([www.keepingchildrensafe.org.uk](http://www.keepingchildrensafe.org.uk)).

<sup>12</sup> United Nations. *Glossary on Sexual Exploitation and Abuse*, Second Edition, 24 July 2017.

<sup>13</sup> Caritas Internationalis. *Child Protection Policy Framework.*

7. Trafficking in persons is a form of exploitation. Trafficking is defined as the recruitment, transportation, or receipt of persons by means of deception, coercion, threat, or force for the purpose of exploitation such as for labour, prostitution, or sexual exploitation.<sup>14</sup>

### **Sexual Abuse**

8. All sexual activity with a child, defined as a person younger than 18 years of age, is considered sexual abuse and is prohibited regardless of the age of majority or consent locally. Mistaken belief in the age of a child is not a defence.
9. To prevent sexual exploitation from occurring, it is prohibited that staff, board members, affiliates, and visitors from buying sex (prostitution) by offering money, gifts, or other material support, regardless of the age or affiliation of the individuals selling sex.
10. Sexual relations between staff/affiliates and program participants (of any age) are prohibited and are grounds for termination. The only exception is a consensual relationship between a staff member and a program participant; in such a case, the employee must fully disclose the relationship to their supervisor, human resources, or the senior management at the outset of employment or the relationship.

### **Child safeguarding**

11. All staff are encouraged to meet a child in presence of a parent or guardian or community member or another colleague.
12. When interacting with child project participants, all staff are prohibited from:
  - a. Spending excessive or unnecessary time alone with a child
  - b. Encouraging a child to interact in a manner that is unrelated to official duties, including:
    - Encouraging a child to meet outside of work-related activities
    - Befriending or sending private messages to a child via email, WhatsApp, Facebook, or any other social media platform

---

<sup>14</sup> United Nations. *UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially Women and Children*, 2000.

## Safeguarding Policy: CRS Minimum Safeguarding Standards and Sub-Standards

Policy	Prevention	Response
<p><b>Standard 1</b></p> <p><b>Safeguarding Related Policies, Code of Conduct Children and Vulnerable Safeguarding Policy</b></p> <p><b>Workplace Harassment Policy (staff-to-staff conduct)</b></p>	<p><b>Standard 2</b></p> <p><b>Safeguarding clause in contracts with vendors, suppliers, sub-recipients</b></p>	<p><b>Standard 6</b></p> <p><b>Investigation procedures</b></p>
<p>1.01 The relevant safeguarding requirements contained within various policies apply to all staff and affiliates.</p> <p>1.02 The organization's safeguarding requirements are applicable to staff and affiliates both during and outside of work hours.</p> <p>1.03 Harassment, including sexual harassment of staff or affiliates, by other staff or affiliates, is prohibited in a policy.</p> <p>1.04 All forms of exploitation and abuse, including (sexual) exploitation or abuse of program participants and community members by staff and affiliates, are prohibited in a policy.</p> <p>1.05 A policy explicitly prohibits staff and affiliates from exchanging money, employment, goods, or services/assistance for sex, including sexual favors.</p> <p>1.06 A policy explicitly prohibits staff and affiliates from engaging in trafficking of persons, in all forms.</p> <p>1.07 Child abuse of any kind, including sexual, physical and emotional abuse and neglect of children, is explicitly prohibited in a policy.</p> <p>1.08 Child labour is specifically prohibited in a policy.</p> <p>1.09 Sexual activities/relations with any child under 18 years of age (UNCRC) are prohibited in a policy.</p> <p>1.10 A policy instructs staff to avoid unsupervised interactions with child program participants.</p> <p>1.11 A policy explicitly requires staff and affiliates to report concerns or suspicions of sexual exploitation, abuse, child abuse or trafficking of persons by a fellow aid/NGO worker (whether in the same agency or not).</p> <p>1.12 A policy explicitly prohibits the organization or its staff from retaliation.</p> <p>1.13 Relevant policies provide definitions of all forms of exploitation, abuse and harassment covered in the organization's policies, in accordance with international standards.</p>	<p>2.01 The organization includes a standard safeguarding clause in all contracts and agreements with service providers and suppliers which affords an equivalent level of protection as the CRS template.</p> <p>2.02 The organization includes a standard safeguarding clause in all contracts and agreements with implementing partners/sub-recipients which affords an equivalent level of protection as the CRS template.</p>	<p>6.01 The organization has investigation processes that demonstrate a commitment to confidentiality and the safety of all parties involved in an investigation process.</p> <p>6.02 The organization has trained staff with the necessary skills, attitudes, and capacity to undertake investigations of safeguarding allegations within the organization or the organization knows where to access support (via alternative external expertise /organization)</p> <p>6.03 The organization maintains a register of allegations, investigation outcomes and disciplinary actions taken.</p>
<p><b>Standard 3</b></p> <p><b>Safe recruitment practices</b></p>	<p><b>Standard 4</b></p> <p><b>Mandatory safeguarding orientation of staff</b></p>	<p><b>Standard 7</b></p> <p><b>Survivor assistance</b></p>
<p>3.01 The organization includes a question regarding previous substantiated safeguarding misconduct in reference checks for all staff and volunteer positions in direct contact with program participant.</p> <p>3.02 The organization requires all selected candidates to self-disclose if they have previously been the subject of a substantiated misconduct investigation concerning harassment, exploitation and/or abuse.</p>	<p>4.01 The organization provides a safeguarding orientation session for all staff and affiliates.</p>	<p>7.01 The organization has documented mapping of locally available services and a referral process for survivors in all areas of operation.</p>
	<p><b>Standard 5</b></p> <p><b>Reporting channels for beneficiaries</b></p>	
	<p>5.01 The organization has established and publicized, at minimum, one reporting channel for communities.</p> <p>5.02 The organization has a documented process in place for handling safeguarding reports from program participants and community members, which ensures confidentiality.</p>	

PPT slides

Section 6

ANNEX 1: Essential service mapping template

MARI - ESSENTIAL SERVICE MAPPING FOR SURVIVORS' IN ..... DISTRICT								
Name of Organization	Addresses <i>(physical and postal)</i>	Phone number	Types/description of services offered	Target group and criteria (if applicable)	Operation days	Operation hours	Guidance on how to make a referral	Name and contact information of person in charge of referrals (if applicable)
Medical Services								
Psychosocial services								
Child Protection								
Shelter services								
Legal services								

ANNEX 2: MARI - Essential service mapped for various project locations

MARI - ESSENTIAL SERVICE MAPPING FOR SURVIVORS IN GUNTUR DISTRICT							
Name of Organisation	Address (physical and postal)	Phone number	Types/description of services offered	Target group and criteria (if applicable)	Operation days	Operation hours	Name and contact information of person in charge of referrals (if applicable)
<b>Medical Services</b>							
govt hospital	Grameena Aaroghya Kendramu, Tadikonda mandal, Tadikonda village 522236	108, 104	Free check up, For pregnant women		365	7-10* Hours	N.Devi Medical officer 9948304955
<b>Psychosocial services</b>							
govt hospital	Grameena Aaroghya Kendramu, Tadikonda mandal, Tadikonda village 522236	108, 104	Free check up, For pregnant women		365	7-10* Hours	N.Devi Medical officer 9948304955
<b>Child Protection</b>							
Child Line	NA		1098 Child help line - Related to Marriage and Nutrition to Pregnant, lactating women and Hostel and Mess to poor and orphans	NA	NA	NA	NA
COPD, CDS	I.C.D.S Project office, Tadikonda near					300 10AM to 5PM	Karavathi, CDS officer
Orphanage	Badeapuram village, Tadikonda mandal					300 24	F.Kishore, Orphanage
<b>Shelter services</b>							
Hostels	BC Kalasala Balura Vasathi Grahnam	NA	Food and Shelter services			24Hrs	Maresh 8639701742
NGO, service to women	LAMP	NA	Village development activities and Farmers	NA	NA	10AM-6PM	K.Sainon Paul
<b>Legal services</b>							
Local police station	Police Station, Main centre, Kanther road opposite, Tulluru subdivision, 522236	100, 112			365	24	Referral letter 023570
Independent Advocates	Infront of Tadikonda Police		Minor cases at local level and Notary works		365	12Hours	G.Durga
Right based NGOs	Mother Teresa Educational society		Developmental activities and Education		300	10Hours	P.Raju, 7981316262

## MARI - ESSENTIAL SERVICE MAPPING FOR SURVIVORS IN KURNOOL DISTRICT

Name of Organisation	Address (physical and postal)	Phone number	Types/description of services offered	Target group and criteria (if applicable)	Operati on days	Operation hours	Guidance on how to make a referral	Name and contact information of person in charge of referrals (if applicable)
<b>Medical Services</b>								
govt hospital	Prabuthva Samajika Aarohya Kendramu, Kodumur, Devanakonda road, Kurnool District, 518464.	108, 104	Free check up, For pregnant women - free food, 24hrs nursing.	for all	365	24*7	Aadhar card, Referral letter	Dr. B. Nagaraju (MBBS, D.Ch) - Medical Officer - 9491436210 S. Sai Prasanth, Junior Assistant - 9000006736
pvt hospital	Maa Vijaya Superspeciality Hospital, Santhamarket street, Old busstand, Kodumur, Kurnool, 518464.	9121212401	Surgeon, Gynecologist, Pediatrics, General medicine, Respiratory Medicine, Anesthesia, Pathology	for all	365	24*7	Aadhar card, Aarogyia Sri Card, Referral letter	Pavani - 9121212401, 9121212402
<b>Psychosocial services</b>								
Psychiatric Unit, District Hospital	Government General Health Hospital, Budhwarpeta road, Budhawara peta, Alluri Sitarama Raju Nagar, Kurnool, 518002	7386093281	Mental health, Depression, Alzheimers, Addictions, Geriatric psychiatry	Needy persons	365	24*7	Aadhar card	Dr. A. Chandrashekar, Psychologist, 7386093281
Counselling centre,	Amrutha Psychological Counselling Centre, Mohmmadia complex, opp. Mourya hotel, Kurnool, 518002	9441371817, 7780208733	Counselling, motivation, personality development	Needy persons	Mon - Sat	10AM - 10PM	OP fee 1500/-	Dr. Peddigari Lakshmana, Psychologist and Hypnotist, 9441371817
Mental hospital	Katam Neuro Psychiatry Clinic, Gayathri estate, beside Vijayadurga diagnostic centre, Deva nagar, Kurnool, 518002	9573139005	Mental health, Depression, Alzheimers, Addictions, Geriatric psychiatry	Needy persons	Mon - Sat	10AM - 10PM	OP fee 800/-	Dr. K. Rajashekar reddy, Consultatnt neuro psychiatrist, 9573139005
Independent counselors	S. Anand Anil Kumar, 1st floor, opp. Munisiff court, Kurnool, 518002	9533333491	Psychotherapy and counseling	Needy persons	Mon - Sat	10AM - 10PM	OP fee 1000/- per sitting	Dr. Anand Anil, Psychologist, 9533330906
<b>Child Protection</b>								
CWC	Women and Child welfare department, Doctors colony, Kurnool, 518002	9182672773	Receiving chidren, conducting inquiries into safety and well being of children, ensuring rehabilitation and restoration	Women and children	300	10AM to 5PM	Referral letter	Jubedha, chairperson, 9182672773
DCPO	Collector Complex, Budhawara Peta, Kurnool, 518002	8333840129	Nutrition to Pregnant, lactating women and children, Pre school activities, health check ups	Women and children	300	10AM to 5PM	Referral letter	Sharadha, DCPU head, 8333840129
Child Line	Collector Complex, Budhawara Peta, Kurnool, 518003	1098	Toll free phone service for children in need of care and protection	Women and children	300	10AM to 5PM	Referral letter	D. Sunkanna, District co-ordinatr, 9000654100
CDPO, ICDS	I.C.D.S Project office, behind Angamwadi No. 8., Koudmur, Kurnool, 518464	1098	Nutrition to Pregnant, lactating women and children, Pre school activities, health check ups	Women and children	300	10AM to 5PM	Referral letter	Varalaxmi, ICDS head, kodumur - 7993955507
Orphanage	SUNRISING YOUTH ORGANIZATION (Orphanage & Oldage Home), opp. : Sri Kanaka Durgamma Temple (Bhavanamma Gudi, Budhawara Peta, Alluri Sitarama Raju Nagar, Kurnool, Andhra Pradesh 518002.	9603615671	Shelter and food to orphanages, oldage people	Orphanage & Oldage Home	365	10AM - 10PM		K. Surya Kiran, Founder and President, 9603615671
<b>Shelter services</b>								
NGO, service to women	SUNRISING YOUTH ORGANIZATION (Orphanage & Oldage Home), opp. : Sri Kanaka Durgamma Temple (Bhavanamma Gudi, Budhawara Peta, Alluri Sitarama Raju Nagar, Kurnool, Andhra Pradesh 518002	9603615671	Shelter and food to orphanages, oldage people	Orphanage & Oldage Home	365	10AM - 10PM		K. Surya Kiran, Founder and President, 9603615671
<b>Legal services</b>								
Local police station	Police Station, Old busstand, Kodumur, Kurnool, 518464	100, 112	Law & Order Issues	Needy persons	365	24	Referral letter	Khadar Vali - Conistable - 9985136820 K. Surendra Babu, A.S.I - 6281913426 P. Sreenivasulu, S.I. - 9121101070 M. Thabrej, C.I. - 9121101070
District legal aid services	The Secretary, District Legal Services Authority, Nyaya Seva Sadan, District Court Buildings, Kurnool, 518002	08518-248821	Legal services	Needy persons	Mon - Sat	10am - 5pm	Referral letter	9440901052
Independent Advocates	Sunkara Sreedhar, Nehru Auto Nagar, Kurnool, 518002	8460236766	Legal consulatants, Matrimonial cases, Family lawyer, Human rights etc.	Needy persons	365	7AM - 11:45PM	Referral letter	Sunkara Sreedhar, Advocate, 8460236766
Right based NGOs	Awakening Peoples Action for Rural Development (APARD), Ramalingeswar Nagar, V.R Colony, Peddapadu, Kurnool, 518003	9000571365	Focus on participatory natural resources development programmes and empowering women with outlook of gender	Rural people	300	10AM - 6PM	Referral letter	Thirupathi Reddy, Chief Functionary, Head, 9000571365

## MARI - ESSENTIAL SERVICE MAPPING FOR SURVIVORS IN HYDERABAD DISTRICT

Name of Organisation	Address (physical and postal)	Phone number	Types/description of services offered	Target group and criteria (if applicable)	Operation days	Operation hours	Guidance on how to make a referral	Name and contact information of person in charge of referrals (if applicable)
<b>Medical Services</b>								
Govt TB and Chest Hospital-Erragadda	Erragadda	040-23814939, 9441889062, 9440822064	Pulmonology and General medicine	ALL	Monday to Saturday	10 Am to 9 PM	Direct walk in	Direct
MNJ Cancer hospital	Lakdikapool	040-23397000, 04023318422, 9701544047	All Cancer disease	All	Monday to Saturday	10 Am to 9 PM	Direct walk in	Direct
Sarojani Devi Eye Hospital	Mehdipatnam	040-23317274, 8374954545	All Eye issues	All	Monday to Saturday	10 Am to 9 PM	Direct walk in	Direct
Govt Maternity Hospital	Sulthan Bazar	04024653647 9849900000	ANC/PNC Services	ALL ANC/PNC Services	Monday to Saturday	10 Am to 9 PM	Direct walk in	Direct
<b>Psychosocial services</b>								
Govt mental hospital	Erragadda	040-23814270	All Mental/ Psychiatric	All Mental/ Psychiatric	Monday to Saturday	10 Am to 9 PM	Direct walk in	Direct
<b>Child Protection</b>								
CWC Ranga Reddy	Narendar Reddy, Chairperson Ranga Reddy Child Welfare Committee, Women and Child Department, Ameerpet.	9908615383	Chairperson	Children	Mon - Sat	10 am to 5 pm	Child Care & protection Services	
CWC Hyderabad	Shailaja, Chairperson, Hyderabad Child Welfare Committee, Lakdi-ka-pul collectorate	9948666197		Children	Mon - Sat	10am - 5pm		
DCPO -	Praveen, DCPU, Ranga Reddy	8099022990	Protection Officer	Children	Mon - Sat	10am - 5pm	Child Care & protection Services	
DCPO -	Srinivas, DCPU, Hyderabad	8499888255	Protection Officer	Children				
Child Line, Ranga Reddy	Shekar	1098	Coordinator	Children	Mon - Sat	10am - p6 m	24X7 Help line Service for children	
ChildLine Hyderabad	Madhavi	1098	Coordinator	Children	Mon - Sat	10am - 6pm	24X7 Help line Service for	
<b>GBV Referrals</b>								
Sakhi RagaReddy	Janaki, Center Administrator, Sakhi RangaReddy	7702220384	Center Administrator	women	24x7 services			
Sakhi Hyderabad	Anitha Reddy, Center Administrator, Sakhi Hyderabad	9603498444	Center Administrator	women	24x8 services			
Bharosa Hyderabad	Mary Augustine, Coordinator, Bharosa Hyderabad,	8712658700	Coordinator	Children	Mon- Sat	10 am to 6 pm		
CDEW center	CDEW Charminar	6281681069	counsellor	Domestic violence	Mon - Sat	10 am to 6 pm		
CDEW center	CDEW Shahmeerpet	8801601127	counsellor	Domestic violence	Mon - Sat	10 am to 6 pm		
CDEW center	CDEW Pahadi Shareef	6281681069	counsellor	Domestic violence	Mon - Sat	10 am to 6 pm		
CDEW center	CDEW Bhahadurpura	6281681069	counsellor	Domestic violence	Mon - Sat	10 am to 6 pm		
My Choice Foundation	Elca gobler, My Choice Foundation working on domestic violence and Trafficking.		counsellor	women and children	Mon - Sat	10 am to 5 pm		
<b>Shelter services</b>								
Sakhi RagaReddy	Janaki, Center Administrator, Sakhi RangaReddy	7702220384	five days shelter	women and children	Mon - Sat	10am - 5pm		
Sakhi Hyderabad	Anitha Reddy, Center Administrator, Sakhi Hyderabad	9603498444	five days shelter	women and children		5.30am to 5.30		
CCI for boys	CCI, Saidabad			children	Mon - Sat	10am - 5pm		
CCI for girls	CCI, Nimboli adda, Hyderabad				Mon - Sat	10am - 5pm		
<b>Legal services</b>								
Balapur police station	M. Sudhakar, SHO, Balapur PS	8712662366	Law & Order Issues	Refugees in needs of police help	Mon - Sat	10am - 5pm		
Kanchanbagh police station	G.Shekar Reddy, SHO, Kanchanbagh PS, Opp Midhani Factory, Near Andhra bank BDI branch	8712660346	Law & Order Issues	Refugees in needs of police help	Mon - Sat	10am - 5pm		
Bahadurpura police station	R.Raghunath, SHO, Bahadurpura PS, Beside MRO office, NH-44 main road	8712660320	Law & Order Issues	Refugees in needs of police help	Mon - Sat	10am - 5pm		
Kalapattar Police Station	Mohammed Asif, SHO, Kalapattar PS, Shamsher Gunj Road, Narsa Reddy Nagar, Tadban, Hyderabad	8712660340	Law & Order Issues	Refugees in needs of police help	Mon - Sat	10am - 5pm		
DLSA Ranga Reddy	Secretary, DLSA, District Court Building, Ranga Reddy District, LB Nagar	040-23446798	Legal Issues	Refugees in need of legal aid	Mon - Sat	10am - 5pm	Free legal aid service	
DLSA Hyderabad	Secretary, DLSA, Civil Court Building, Ground Floor, Purani Haveli, Hyderabad	040-24568627	Legal issues	Refugees in need of legal aid	Mon - Sat	10am - 5pm	Free legal aid service	

**MARI - ESSENTIAL SERVICE MAPPING FOR SURVIVORS IN JANGAON DISTRICT**

Name of Organisation/Institution	Address (physical and postal)	Phone number	Types/description of services offered	Target group and criteria (if applicable)	Operation days	Operation hours	Guidance on how to make a referral	Name and contact information of person in charge of referrals (if applicable)
<b>Medical Services</b>								
Govt hospital	Dr.Gopal Rao, Supdt. District Area Hospital, Champakhills, Jangaon, 506167 9849753646	9440264209	All types of medical Services	for all	all days	24x7	any ID documents required, Fees to be paid, legal requirements if any required	9440264209
Pvt hospital	Varahi Multispeciality Hospital H.no: 4-5-61/4, Hanmakonda Road, Jangaon	9390337257	General	for all	Mon - Sat	9am -9pm		9390337257
Pvt hospital	Suraksha Multi Speciality hospital, 6-2-2/49, Hyderabad Road, Jangaon-506167	9701145623	General	for all	Mon - Sat	9am -9pm		9701145623
<b>Psychosocial services</b>								
Counselling centre,	Dr. Sridhar Raju Yerra, MBBS, DPM, FCGP, FIPS Swastik Samalochana Clinic 80 ft road, M.V Colony, Autonagar, Kothawada, Warangal-506002	9849058514	Psychiatrist	Needy persons	Mon - Sat	10 am - 3pm	OP fee 3,000/-	K.Srikanth 9866493668
Mental health service clinic/hospital	Dr. B.Jagadeesh Jayakrishna Psychiatric Hospital 7-1-229/A/1, Padmakshitemple Road, Beside Hunuman Temple, Hanumakonda-506001	9848776430	Psychiatrist	Mental disorder people	Mon - Sat	10am-1pm	OP fee 700/-	9848776430
De Addiction & Rehabilitation Centre	Helping Hand De Addiction Centre,	9152892971	Drug de addiction Centre	Drug de addiction Centre	Mon - Sat	9am - 10pm		
<b>Child Protection</b>								
CWC	Koppu Uppalaiah H.No.12-32, Pochannapet village, Bachannapet mandal, Jangaon District	9133476736, 8074872578	Chairperson	Children	Mon - Sat	10am - 1pm		
DCPO	Ravikanth Lakkuntla	8008777873	Protection Officer	Children	Mon - Sat	10am - 5pm		
Child Line		1098	Coordinator	Children	Mon - Sat	10am - 5pm		
DWO, Jangaon	Smt.D.Florence	9948048355	Nutrition food supply & Counselling	Women, Children, Disabled and Senior Citizens	Mon - Sat	10am - 5pm		9948048355
Orphanage	Nagesh, Shishugruh, Specialized Adoption agency)-1 6-1-46/2, Kancharakunta, Laskar bazar,Hanumakonda	9704115953	New baby adoption centre	New Born Children	Mon - Sat	10am - 5pm		9704115953
<b>Shelter services</b>								
G.Inna Reddy Prajadhara Social Welfare	3-66/4, Reggadithanda, Zaffargadh, Jangaon.	9866216680	Orphanage	Boys & Girls	Mon - Sat	10am - 5pm		<a href="mailto:gaadeinnareddy@gmail.com">gaadeinnareddy@gmail.com</a>
K.Jayamani JohnAgape	H.No.4-5-58, Dayanilayam,Near Police Quarters,Jangaon.	9390055090	Children Home	Boys & Girls	Mon - Sat	10am - 5pm		<a href="mailto:aimministries2004@gmail.com">aimministries2004@gmail.com</a>
Y.Vincent Reddy Divine Charitable Trust	Seva Sadan Ashram, Narmetta Main Road, Narimetta, Jangaon.	9246290288	Children Home	Boys	Mon - Sat	10am - 5pm		<a href="mailto:Vincentreddy.yer@gmail.com">Vincentreddy.yer@gmail.com</a>
EP.Premalatha Balasadhram (Gov't)	H.no: 1-9-96, Girinigadda-Jangaon.	9908628891	Children Home	Girls	Mon - Sat	10am - 5pm		<a href="mailto:chjangaon@gmail.com">chjangaon@gmail.com</a>
<b>Legal services</b>								
Police station (ACP office)	K. Parthasarathi, ACP	8712685184	Law & Order	all	Mon - Sat	10am - 5pm		8712685201
PoliceStation (Local)	T. Damodar Reddy, Inspector of Pc	8712685032	Law & Order	all	Mon - Sat	10am - 5pm		8712685202
Local police station	Seetharam, DCP Central Zone	9491089147	Law & Order Issues		Mon - Sat	10am - 5pm	Jangaon and Ghanpur	9491089147
Local police station	Railway staion road Jangaon	8712685202	Law & Order Issues		Mon - Sat	10am - 5pm	Jangaon	8712685202
Local police station	B. Raja Mahendra Naik, DCP West Zone	8712685176	Law & Order Issues		Mon - Sat	10am - 5pm	Jangaon, Ghanpur and Wardhannapet Divisions	8712685200
Independent Advocates	Nageswar rao G	9849458545	Legal Issues	Women & Children Issues	Mon - Sat	10am - 5pm	Domestic Voilence	9849458545
Independent Advocates	Revathi, Advocate	9866137006	Legal Issues	Women & Children Issues	Mon - Sat	10am - 5pm		
Rudramadevi Mahila Macs	Jangaon	9010001012	Women & Children Issues	Women & Children Issues	Mon - Sat	10am - 5pm		
Laxmi Vardhan Swachanda Seva Society	Chitakodur Road, Near Bharath Gas, Jangaon.	8466929593 / 9030998826	Children Home	Girls	Mon - Sat	10am - 5pm		8466929593 / 9030998826

## Modern Architects for Rural India -MARI

MARI - ESSENTIAL SERVICE MAPPING FOR SURVIVORS IN WARANGAL DISTRICT							
Name of Organisation/Institution	Address (physical and postal)	Phone number	Types/descrip tion of services offered	Target group and criteria (if applicable)	Operati on days hours	Guidance on how to make a referral	Name and contact information of person in charge (if applicable)
<b>Medical Services</b> Govt hospital	Mahatma Gandhi Memorial Hospital, Warangal, Warangal - 506003 (Near S.P. Chowdary Hospital) Dr. Chandra Shekhar, Superintendent, 9849903030 Warangal-506001	3870-2112863.  733-7555108 733-444-108	All types of medical services  General	for all  for all	all days 24x7  all days 24x7	Free  OP fee 500/-	108, 104, 114, 100  K.Srikanth 9866493668  7337555108
<b>Psychosocial services</b> Counselling centre,	Dr.Srihar Raju Yerra, Swastik Samarochana Clinic 80 ft road, M.V Colony, Autonagar , Kothawada, Warangal-506002	9849038514	Psychiatrist	Needy persons	Mon - Sat	Op fee 3,000/-	K.Srikanth 9866493668
Mental health service clinic/hospital	Jayakrishna Psychiatric Hospital 7-1-229/A/1, Padma kshitemple Road, Beside Hunuman Temple, Hanumakonda-506001	9848776430	Psychiatrist	Mental disorder people	Mon - Sat	OP fee 700/-	9848776430
Independent counselors	Md. Arzi, Psychological Care & Counselling Centre, 7-2-1072, Opp. Hanuman Temple, Hanumakonda.	8009658844	Psychiatrist	Psyco-social issues, solutions for Mind Problems	Mon - Sat	Op fee 1000/- per sitting	8009658844
Dr. Addition & Rehabilitation Centre	Healing Hand De Addition Centre, H.NO # 2-6920 OPP-DCB BANK, Circuit House Rd. KIN Reddy Colony, Hanamkonda-506001	8341599660	Drug de addiction Centre	Drug de addiction Centre	Mon - Sat	Based on Case and Rehabilitation Time	098497 34135
<b>Child Protection</b> CWC	Anil Chandar Rao, Chairperson Balu Raksha bhavan, # 1-7-641/C, II nd Floor, Room No: 2, Assuntha Bhavan, Subedari, Hanamkonda, Warangal-506001	9849072259	Chairperson	Children	Mon - Sat	Child Care & Protection Services	9849072259
DCPO	Balu Raksha bhavan, # 1-7-641/C, II nd Floor, Room No: 2, Assuntha Bhavan, Subedari, Hanamkonda, Warangal-506001	9866198112	Protection Officer	Children	Mon - Sat	Child Care & Protection Services	9866198112
Child Line	Balu Raksha bhavan, # 1-7-641/C, II nd Floor, Assuntha Bhavan, Subedari, Hanamkonda, Warangal-506001	6305015401 or 1098	Coordinator	Children	Mon - Sat	24X7 Help line Service	6305015401 or 1098
DWGO, Hanumakonda	Jayanthi, DWGO, Integrated District Collector's Office, Subedari, Hanamkonda, 506001	6303809964	Nutrition food supply & Counselling	Women, Children, Disabled and Senior Citizens	Mon - Sat	Govt. Department	6303809964
DWGO, Warangal	Rajamani, DWGO, Sai Nagar, Hanamkonda-506001	9849208604	Nutrition food supply & Counselling	Women, Children, Disabled and Senior Citizens	Mon - Sat	Govt. Department	9849208604
CDPO, ICDS Project, Hanumakonda	Vishwaja, CDPO ICDS Project, Hanumakonda	9959701866	Nutrition food supply & Counselling	Women, Children, Disabled and Senior Citizens	Mon - Sat	Govt. Department	9959701866
CDPO, ICDS Project, Wardhanappet	Debora, CDPO Wardhanappet, Warangal-506113	9441473341	Nutrition food supply & Counselling	Women, Children, Disabled and Senior Citizens	Mon - Sat	Govt. Department	9441473341
CDPO, ICDS Project, Wardhanappet	Wardhanappet, CDPO Wardhanappet, Warangal-506132	9491051683	Nutrition food supply & Counselling	Women, Children, Disabled and Senior Citizens	Mon - Sat	Govt. Department	9491051683
Orphanage	Shreegurut, Specialized Adoption agency)-16-1-4672, Kancharakunta, Lashkar Hanamkonda	9704115953	New baby adoption centre	New Born Children	Mon - Sat	Govt. Shelter home	Anil Chandar Rao (CWC) 9849072259
Orphanage	M. Sarvani, Govt. Children Home, Subedari, Hanumakonda	7702345174	Orphan Children (Hostel Facility)	Girls	Mon - Sat	Govt. Shelter home	Anil Chandar Rao (CWC) 9849072259
Orphanage	Assuntha saba Nilayam Church Complex, Street No. 1, Postal Colony, Subedari, Hanamkonda, Telangana 506001	8999025809	Unaffected HIV infected Children	Girls	Mon - Sat	NGO Based Shelter home	8999025809
Orphanage	Fr. Alexander Philip Karunakayam Holistic Care Centre for HIV/AIDS, Kuntlapuram, PO: Peddapendali, Warangal 506115.	9451277884	HIV infected Children	Boys	Mon - Sat	NGO Based Shelter home	08711 223457
Orphanage	Kalyan Kumar, Malikamba Institute of Mentally handicapped children & disabilities, bhaisamudram, Hanamkonda	9618329065	Mentally Challenged Children	Boys/Girls	Mon - Sat	NGO Based Shelter home	9618329065
Orphanage	M. Sarabi, Sai Ananda seva Trust, Wadddepally, Hanumakonda	8978465561	Orphan Children (School Program)	Boys/Girls	Mon - Sat	NGO Based Shelter home	8978465561
Orphanage	Jannu Niveditha, REACH, Lashkar basar, hanumakonda	7989552753	Orphan Children (School Education)	Girls	Mon - Sat	NGO Based Shelter home	7989552753
<b>Shelter services</b> Hostels	O. Chandra prakash, Oasis Charitable Trust, Wadddepally, Church Circle, hanumakonda	9989416630	Orphan Children (Hostel Facility)	Boys	Mon - Sat	NGO Based Shelter home	Anil Chandar Rao (CWC) 9849072259
Shelter home	Wadddepally, Church Circle, hanumakonda	7942698259	Hostel Services	HIV infected and Affected Children	Mon - Sat	NGO Based Shelter home	81athavari (Bachh) 970050896
NGO, service to women	Fathmanagar, Kazipet	9989842411	Shelter Home for Women	Women	Mon - Sat	NGO Based Shelter home	Jayanthi, DWGO, Hanumakonda, Anil Chandar Rao (CWC)
District women cell	Service Home, Near sumangali function hall, South Colony Road, hanumakonda	8106321552	Distress Girl Children	Children	Mon - Sat	Psychological, Prosecution, Medical, Legal,	Anil Chandar Rao (CWC) 9849072259
<b>Legal services</b> Local police station	Bharosa Centre, hanumakonda Supported by Women Safety Wing-Telangana						
Local police station	Shaik Saleem, DCP Central Zone	8712685111	law & Order issues		Mon - Sat	Warangal, Hanumakonda & Kazipet Divisions	8712685174
Local police station	P. Ravindar, DCP East Zone	8712685175	law & Order issues		Mon - Sat	Warangal, Hanumakonda, Mamunoor Divisions	8712685222
Local police station	B. Raja Mahendra Naik, DCP West Zone	8712685176	law & Order issues		Mon - Sat	Jangaon, Warangal and Wardhanappet Divisions	8712685200
District legal aid services Independent Advocates	DLSA, Adalath Circle, Nakkala Gutta, Hanumakonda, Warangala 506001 Gopika/Advocate, House No 2-6-1307, Road No 1c, Bhanu nagar, Hanamkonda, Warangal - 506001	9440901063 6281491106	Legal issues	Distress People Women & Children Issues	Mon - Sat	Free Legal aid Sen Domestic Violence	9440865392 6281491106
Right based NGOs	Pragathi Seva Samithi, 2-5-898, Circuit House Rd, Nakkala Gutta, Hanamkonda, Telangana 506001	9848698732	Women & Children Issues	Women & Children Issues	Mon - Sat	Domestic Violence	9000018712
Right based NGOs	FMKSSS (9866493668) 1-7-641, immaculate Convent, Subedari, Hanamkonda Warangal 506001	94900 89915	Women & Children Issues	Women & Children Issues	Mon - Sat	Domestic Violence	9000018712
Right based NGOs	Mt. Parasharammu, Samanthi 18-1-16/2/1/A URSU ROAD, ursu road, Mahankali St, Adarsha Colony, Rangsharpet, Warangal-506005	9849208279	Women & Children Issues	Women & Children Issues	Mon - Sat	Domestic Violence	9849208279
Any other	Balukasa Training Centre H.no: 24-7-7/3, pathmanagar, NIT (post), Kazipet, Warangal-506004	0870-2453255	Training Centre	Training Centre	Mon - Sat	Training centre for NGOs Based Organizations	Training centre for NGOs 9380124223

Modern Architects for Rural India -MARI

Section 7

ANNEX 1: Safeguarding Incident Report Form

Safeguarding Incident Report Form
Name, position and contact details of the reporter
Name, position and contact details of the alleged survivor <i>(indicate if choosing to remain anonymous)</i>
Has the alleged survivor consented to participating in the investigation/being contacted again in relation to this matter? YES NO
Details of the report/incident <i>(what happened, when, ongoing, where)</i>
Name, position and contact details of the subject(s) of the allegation <i>(if names are unknown, include any other potentially identifying information—such as physical descriptions, roles in the organization, nationality/ethnicity, gender, estimated age, location of assignment, etc.)</i>
Personal safety concerns of the reporter
Personal safety concerns of the survivor
Any other safety concerns identified
Support services offered/provided to the survivor <i>(medical, psycho-social, legal or other assistance)</i>
Any other steps taken:
Any potential criminal conduct involved? Has/will the allegations be reported to law enforcement/local authorities?
Report recorded by <i>(name, title, contact information)</i>
Date of report

## Modern Architects for Rural India -MARI

### ANNEX 2: Register of Safeguarding Allegations—Confidential and Restricted Access

Case number	Allegation type	Report date	Subject of investigation	Survivor (if known)	Reporter	Donor affected	Date allegation reported to donor	Date case closed	Outcome

**ANNEX 3: Credibility/Plausibility Assessment Form**

**Case Numbers:**

**Date Completed:**

**Assessment Team Members:**

**Date Allegation Received:**

**Initial Allegation:**

**Information Gathered:**

**Implausibility Assessment Outcome—Rationale:**

**Recommendations:**

**ANNEX 4: Investigation Risk Management Plan**

---

<b>Entity/individual at risk</b>	<b>Identified risk</b>	<b>Actions to mitigate</b>	<b>Person responsible</b>
<b>Survivor</b>			
<b>Reporter</b>			
<b>Witnesses</b>			
<b>Other Staff Members</b>			
<b>Subject of the Investigation</b>			
<b>Investigators</b>			
<b>Organization</b>			

**ANNEX 5: Donor Notification Template**

**To:**

**CC:**

**Subject:** *[insert donor agreement identifier and case type]*

To whom it may concern,

I am writing to inform you of an alleged safeguarding case under award *[insert donor agreement identifier]*. The incident/s are alleged to have occurred at *[insert town/city]* and *[insert provide a summary of the allegation as it relates to the policy violation]*.

We have commenced an investigation into the allegations. In the meantime, we have *[insert actions taken to-date]*. We will update you on the results of our investigation as well as any corrective actions taken or planned within *[insert]* business days of its conclusion.

If you have any enquiries regarding this matter, please contact *[insert contact name and contact information, i.e., phone and/or email address]*.

Thank you and best regards,

**ANNEX 6: Investigator Terms of Reference**

You have been asked to undertake an investigation of an alleged breach of *[insert]*. If you are of the view that assigning you to this case may create an actual, potential or perceived conflict of interest, you must raise this with *[insert]*.

**Confidentiality**

Throughout the investigation you will receive sensitive information—including identity of survivors, subject of the investigation, witnesses and details about the events being investigated. You are responsible for ensuring the confidentiality of the information obtained throughout the investigation. You must limit the dissemination of this information to only those persons who need access to the information to contribute to the investigation or support those affected by the investigation.

You must refrain from discussing the investigation in non-secure areas. Such non-secure areas include— but are not limited to—shared offices, building parking lots, elevators, hallways, lobbies and any other common areas.

If you become aware of a breach of confidentiality, i.e., you hear others discussing the investigation, you must notify *MARI Safeguarding Focal Point* immediately.

You must ensure that written documentation developed and obtained during the investigation remains secure. Case notes, written and printed documentation may only be copied and distributed as permitted by *MARI Executive Director* or *MARI Safeguarding Focal Point*.

You must refer all news media related inquiries to *MARI Safeguarding Focal Point* or *Director and ICC Presiding Officer*.

**Retaliation**

Retaliation against anyone involved in the investigation process is strictly prohibited. If you believe that you or anyone else have been mistreated or otherwise retaliated against due to your/their engagement with this investigation, please report to *MARI Safeguarding Policy Focal Point* and *MARI ICC Presiding Officer* immediately. Likewise, it is expected that investigators will not retaliate or use the information they obtain throughout the investigation against others, in any way.

**Investigation Process**

You must ensure that due process is respected by, and towards, all parties involved in the investigation.

You must submit your draft investigation report to *MARI ICC Presiding Officer* for review.

If, during the investigation, programmatic or systematic issues are identified that require attention, they should be detailed in the investigation report.

By signing this statement, you acknowledge that violating the terms set out above may result in disciplinary action up to and including, separation.

Signed \_\_\_\_\_ Date \_\_\_\_\_

Print Name \_\_\_\_\_

## ANNEX 7: Investigation Plan

**Date Prepared:**

**Case Number:**

**Location:**

**Investigation Team:**

**Subject(s) of the Investigation:**

**Alleged Survivor:** (when known) If there are special concerns about security, names can be withheld in this document and referred to by status (staff, female beneficiary, male child beneficiary, etc.).

### I. Allegations

Each potential incident and/or policy violation should be identified separately and numbered. A brief citation to the potential policy violation should be included.

### II. Steps Taken to-Date

It is important to detail the steps that were taken prior to preparing the investigation plan. Include date, action and involved persons in chronological order. Some examples are:

- if there needed to be a clarifying conversation with a reporter
- any referral support provided to the alleged victim/survivor
- steps taken to address safety concerns

### III. Donors/Grants Potentially Affected

Identify donors and grants that fund the salary of the subject of the investigation. Where donors have mandatory reporting requirements, document when the donor notification letter was sent.

### IV. Investigation Approach

#### A. Background and Context

This can be more relevant for investigators who may not be as familiar with the local context of the program and operations.

#### B. Legal Implications

Outline any legal implications—including relevant criminal codes, labor laws, etc.

#### C. Sources of Information (for example)

##### 1. Document Review

- a. HR files
- b. Logs of complaints for the Community Feedback and Response Mechanisms
- c. Monitoring and Evaluation Reports, especially survey results and/or raw data from surveys
- d. Drivers' and guesthouse logs, invoices, expense reports, beneficiary distribution list, beneficiary registration lists, training attendance sheets, etc.
- e. Documents or documentation provided by reporters or witnesses (social media chats, SMS, emails, phone logs, chat logs, images received, messages received, etc.)

## Achieving Safeguarding Compliance – The Guidelines

### 2. Interviews

List all identified persons for interviews known at the beginning of the investigation. Additional interviewees may be identified as the investigation proceeds.

### 3. Additional Sources of Evidence

- a. Search of the subject of the investigation’s email account, limited by search terms for date, sender/receiver, key words and any other limiting information, and in accordance with data privacy protections under local law
- b. Where phones and computers belong to the organization, a search of cell phone records or physical phones and computers for relevant data
- c. GPS tracking information (on vehicles, for instance)
- d. Site visits (to understand location of incident, evaluate details of reported incident in context of location)

### D. Investigation Timetable

Investigations can change and run into obstacles, so try to include broad and realistic ranges for things—such as document reviews, conducting interviews and finalizing the report.

Investigation step	Person responsible	Date of completion
Finalize Investigation Plan		
Document Review		
Interview Questions Finalized		
Interviews Conducted		
Draft Report Submitted		
Draft Report Reviewed		
Final Report Submitted		

**ANNEX 8: Subject of Investigation—Notification Letter**

**From:**

**Subject:** Notice of Investigation

The purpose of this letter is to inform you that *Modern Architects of Rural India (MARI)* is investigating allegations that you may have engaged in misconduct as defined in *Modern Architects for Rural India (MARI) Code of Conduct or .....* (*mention the relevant Policy name*).

*MARI* has received information alleging that you [*insert list of allegations*]. If found to be true, this would constitute a violation of [*insert list policy violations*], which in turn, may amount to misconduct.

*MARI* is committed to ensuring that concerns relating to staff integrity are investigated in an impartial, thorough and timely manner, and that investigations are conducted with fairness for all parties concerned. The investigation seeks to establish the facts by obtaining, evaluating and analysing all available information and evidence to substantiate or refute the concerns.

As a staff member of *MARI*, you have an obligation to cooperate with the investigation, and to provide truthful information in addressing the allegations under investigation. This includes making yourself available for, and responding to, questions during one or more interviews. Should you provide misleading information or fail to cooperate with the investigation, this may be considered as misconduct.

You are furthermore required to volunteer any additional information that might be considered relevant to the matter under investigation, including naming witnesses and/or indicating evidence that support your statements. Should you later think of any further information which you believe may assist in the investigation, you are requested to re-contact the investigators.

You are entitled to be treated respectfully during the interview and to take reasonable breaks as required.

You are entitled to protection against any retaliatory action taken against you for your co-operation with this investigation. Similarly, protection is given to individuals who, in good faith, report suspected misconduct or otherwise provide information in good faith of wrongdoing by one or more individuals.

To protect the integrity of the process, the investigation is **confidential**. Information related to this investigation **may not be disclosed without prior authorization from *Modern Architects for Rural India***.

The standard of proof applied to conclude whether an allegation is substantiated is “the preponderance of the evidence.” This means that the collected evidence indicates that it is more likely than not that a violation of *MARI Code of Conduct or .....* (*mention the relevant Policy name*) has taken place.

If you have any questions about the investigation process, please do not hesitate to ask the investigators.

I have read and understood my rights and obligations regarding the investigation process as described above.

## Achieving Safeguarding Compliance – The Guidelines

Signed \_\_\_\_\_ Date  
\_\_\_\_\_

In the Presence of \_\_\_\_\_ Date  
\_\_\_\_\_

**ANNEX 9: Record of Interview**

<b>Strictly Private and Confidential—Interview Notes</b>	
<b>Case number</b>	
<b>Name of interviewee</b>	
<b>Job title</b>	
<b>Department</b>	
<b>Date of interview</b>	
<b>Interview location</b>	
<b>Names(s) of interviewers</b>	
<b>Name(s) of other attendee(s)</b>	<i>e.g., note-taker, companion</i>
<b>Introduction</b>	
<i>Confidentiality Form and Interview Preamble—Internal/External</i>	
<b>Note of Discussions</b>	
<i>When taking notes, the initials of those speaking should be recorded against what they stated. As much as possible, record the statements made by the interviewee verbatim.</i>	
<b>Additional Information</b>	
<i>Examples include reasonable adjustments implemented to enable the witness to attend interview and any documentation supplied by the witness.</i>	

### ANNEX 10: Investigation Report Template

#### **Executive Summary (optional)**

An executive summary is a very concise overview of the investigation from inception through to the report; it is only necessary when the report itself is long. It can provide key talking points for those in senior positions to understand the basic results of the investigation. It should be written last, and address the following points, in brief:

- allegations
- time period of investigation
- conclusions (unsubstantiated/substantiated)
- recommended disciplinary sanctions and the general types of corrective measures.

#### **Allegations**

Provide a summary of the allegations. If additional allegations surfaced during the course of the investigation, they should be added as well, explaining how they arose. If there are multiple allegations, each should be listed with a separate heading and discussed and analysed separately, even if some of the evidence is overlapping.

#### **Relevant Policies and Procedures**

Include the relevant excerpts of the applicable policies that may have been violated.

#### **Investigation Team**

List the members of the investigation team.

#### **Background**

Keeping in mind that this report may be shared with donors, it is important to include a short paragraph about the program in which the allegations arose. Outline any relevant laws (labor laws etc.) in this section.

#### **Steps Taken Prior to the Investigation**

This can be taken from the Investigation Plan, adding any additional steps that were taken, after the investigation plan was written, but before the conclusion of evidence-gathering.

#### **Investigative Measures Taken**

List out:

- documents reviewed, detailing any specific analysis, and attaching annexes of spreadsheets or other data that is analysed.
- names and positions of interviewees (or, if protecting identities, witness 1, Witness 2, etc.)
- any notable challenges in conducting the investigation (unavailable witnesses, documents, etc.)

#### **Factual Findings**

For each fact and heading, describe:

- the main evidence that supports the factual finding (such as statements from the alleged survivor/victim)
- present any evidence that supports a contrary finding (such as statements from the subject)

#### **Outcome**

Analyse the evidence, deciding which version is more likely, using:

- corroborating evidence (witness statements, documentary evidence, etc.)

## Achieving Safeguarding Compliance – The Guidelines

- assessing credibility by identifying consistent or inconsistent statements, past history of behaviour, plausibility of story, motive to lie, reputation for truth-telling or lying
- state if the allegations are un/substantiated and what policy the conduct breaches.

Recommendations

*[insert]*

### **Disciplinary Measures**

*Possible disciplinary measures*

- termination of employment
- unpaid suspension
- demotion and/or ineligibility for promotions for proscribed time period
- transfer of duties and/or location
- warning letter to file
- training requirements
- counselling requirements
- performance plan

*Factors to consider*

- seriousness of the misconduct (exploitation, violence, extreme harassment)
- prior misconduct
- frequency of misconduct
- position of suspect (the higher the position, the greater the obligation to treat people with respect and dignity)
- internal procedures and practices
- ability to accept responsibility and reform versus continued denial

### **Correctives Measures**

Investigators are well-placed to identify gaps in knowledge and awareness, as well as gaps in written procedures and/or actual implementation of procedures that either contributed to the occurrence of the misconduct or made it possible to occur. Investigators can make general recommendations on measures that could help mitigate future occurrences of such behaviour.

Examples:

- staff trainings on policies
- awareness sessions with beneficiaries and communities on their rights and responsibilities, including how to report concerns about programs or staff
- strengthening feedback and response mechanisms in communities
- strengthening internal reporting systems on staff misconduct

**ANNEX 11: Opportunity to Respond**

As you know, you are the subject of an investigation. Specifically, it is alleged that *[specify conduct that is subject of investigation]*.

You are invited to provide a written response to the allegations and evidence against you. You have *[insert number of days allowed by law]* or by *[insert the appropriate date]* to provide a written response.

The following information is provided to you in order to respond: *[insert required details from the investigation OR reference to attached documents, as required by legal requirements]*.

**ANNEX 12: Outcome Letter to the Subject of the Investigation**

Please refer to the specific legal requirements under your labor laws on what information is necessary to include in an outcome letter. In some jurisdictions, you may be required to shared details of how you reached your factual findings and conclusions.

**To:**

**From:**

**Date:**

**Subject:** Safeguarding Investigation Outcome

On *[insert date]* *Modern Architects for Rural India (MARI)* received a report of possible misconduct by you. Specifically, it was reported that you *[insert general nature of alleged misconduct]*.

*Modern Architects for Rural India (MARI)* wishes to advise you that the investigation is now complete, and the evidence obtained does/does not substantiate the reported misconduct.

Informed by this outcome, *Modern Architects for Rural India (MARI)* intends to (list any sanctions/follow up actions planned):

- 1) xx
- 2) xx
- 3) xx
- 4) etc.

If you have any enquiries regarding this matter, please contact *MARI Executive Director or Safeguarding Focal Point* on 9392131114. As a reminder, *MARI* takes the prohibition against retaliation very seriously. As we have previously discussed with you, please do not engage in any conduct that could be considered retaliatory.

Thank you and best regards,

### ANNEX 13: Interview Preamble

Inform the interviewee of the following:

- I am here to follow up on some issues that have been raised as a possible violation of our *Safeguarding Policies*.
- Before we start, I want to explain my role and go over how we will proceed. I am here as a neutral party to gather information. I will be asking you questions. I will try not to make you uncomfortable, but it is important for me to get as much information as possible. I will be/my colleague will be taking notes as we talk, and we will review them at the end to make sure I have all the details correct. If you need to take a break or use the rest room during our meeting, just let me know.
- As a staff member of *Modern Architects for Rural India (MARI)*, you are required to provide all relevant information. In responding to questions, please be as precise as possible in your answers. If you do not know the answer, please state that you do not know.
- The information you provide will be used to determine the facts, reach conclusions, and make recommendations. We as the investigators do not make decisions on the findings of the investigation. Such decisions are made by *MARI Internal Complaints Committee*.
- The interview is confidential, so please refrain from discussing the interview with anyone—as you attested to when signing the Confidentiality Form. However, information gathered during this interview may be shared with *MARI Internal Complaints Committee* to assist them in determining the appropriate course of action. Additionally, information gathered that indicates that misconduct or wrongdoing has occurred may be shared with the subject of the investigation to afford him/her the opportunity to respond, in keeping with due process requirements. When doing so MARI will consider the safety and security needs of those involved and will, wherever possible, withhold details that would reveal the source of the information.
- This is a preliminary interview; further interviews may take place.

Do you have any questions regarding the standards applicable for the interview?

**ANNEX 14: Confidentiality Form**

*Modern Architects for Rural India* is investigating an alleged *MARI* (*Code of Conduct* or *specify the policy name*) violation. As part of this process, we are requesting your participation in an interview. The purpose of this notice is to provide you with important information about your rights and responsibilities during this process.

*MARI* expects all staff to cooperate fully with investigations by answering questions completely and honestly, providing any documents that may be relevant and making yourself available for interviews, as needed.

*MARI* expects all staff to maintain the confidentiality of investigations both during and after they have concluded. We request that you refrain from talking about the process, i.e., statements made during the interview, with people in your personal life or colleagues who are not responsible for the investigation. You must also refrain from using information learned because of the investigation for private gain, or to favour or prejudice any party. Divulging any information related to this investigation to any persons other than the investigators may amount to misconduct and result in disciplinary action. If you become aware of a breach of confidentiality, i.e., you hear others discussing the investigation or the matter it concerns, you are obligated to inform us immediately.

*MARI* considers the confidentiality of the investigation of utmost importance. To the extent possible, *MARI* will not reveal the source(s) of the information we obtain via the investigation process to the subject of the investigation or to other witnesses.

Retaliation against anyone involved in this process is strictly prohibited. If you believe you have been mistreated or otherwise retaliated against because of your participation, please let us know immediately. Likewise, you are not to retaliate against anyone involved in this process.

You are entitled to be treated respectfully during the investigation process. You can also access counselling or debriefing services from *[insert]*. The service is entirely confidential.

*MARI* will be leading the investigation, and *Safeguarding Focal Point* will be assisting with the investigation. If you have any questions, please contact *Safeguarding Focal Point* at 9392131114 or [jayaramarao@mari-india.org](mailto:jayaramarao@mari-india.org)

Your signature indicates that you have received this notice and understand your rights and the agency's expectations.

Signed \_\_\_\_\_ Date \_\_\_\_\_  
\_\_\_\_\_

Print Name \_\_\_\_\_