

Safeguarding Policy

1. Purpose

HelpAge Deutschland e.V. (HAD) is part of the global HelpAge network of organisations promoting the right of all older people to lead dignified, healthy and secure lives.

HAD has adopted and contextualised this policy from the global HelpAge safeguarding framework to ensure alignment with international safeguarding standards across the network.

We are committed to ensuring that everyone who interacts with our organisation—whether directly through our staff and operations in Germany, or indirectly through our partnerships and programmes—is protected from all forms of harm, abuse, neglect and exploitation. All HelpAge representatives are expected to uphold the highest standards of behaviour set out in our Code of Conduct and we will act against wrongdoers who use their position of trust to harm anyone including older people/ adult at risk of harm and children.

This policy applies across all our work and provides a framework of accountability and guidance for staff, Board members, consultants, contractors, and implementing partners. This policy complements the HAD Code of Conduct (Ethik- und Verhaltenskodex), which is a separate, binding document for HAD employees and other related policies.

This policy does not cover:

- Bullying and Harassment (sexual harassment) in the workplace (considered as safeguarding concerns)
- Protection concerns in the community, including child protection concerns not caused by HelpAge International Representatives.

2. What is Safeguarding?

Safeguarding is the responsibility of organisations to ensure that their staff, operations, and programmes do no harm to older people, adults at risk, children, or staff, nor expose them to abuse or exploitation.

This encompasses:

- Protection from Sexual Exploitation, Abuse and Harassment (PSEAH)¹;
- Child safeguarding (all persons under 18);
- Adult safeguarding, with particular focus on older persons and at-risk adults.

Safeguarding means taking proactive steps to prevent harm, building organisational systems and cultures that promote dignity and equality, and responding effectively and fairly when concerns arise.

3. Scope

This policy applies to:

- All HAD employees, interns, and volunteers;

¹ In common with the humanitarian and development community we use this term to refer to the prevention of sexual exploitation and abuse of affected populations by staff or associated personnel. The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13)

- The HAD Board of Trustees;
- Consultants, contractors, suppliers and service providers engaged by HAD;
- Invited visitors including journalists, donors, and politicians;
- Local implementing partners and HelpAge International when delivering programmes supported by HAD.

The term ‘representatives’ will be used to refer to all people from the list above and associated with HAD. All representatives of HAD are expected to comply with this policy and with the HAD Code of Conduct. The partner organisation will ensure that it implements this policy either by referencing it directly, or by adopting its own local policy in accordance with this policy. This policy is considered a minimum standard and is not intended to replace existing safeguarding policies and procedures as long as they are consistent with this policy.

4. Policy statement

HAD believes that all people have the right to be protected from harm, abuse, neglect and exploitation regardless of age, gender, disability, ethnicity, religion, sexual orientation, gender identity, social origin, or any other status.

We recognise that unequal power relations and structural inequalities—such as ageism, gender inequality, disability discrimination, poverty, or displacement—can increase risks of harm. HAD commits to addressing these risks proactively and to building equitable, transparent, and accountable systems across all our work.

HAD has zero tolerance for any form of abuse, exploitation or neglect carried out by its representatives or partners.

HAD commits to addressing safeguarding throughout its work, through the **three pillars of prevention, reporting and response and promoting good governance and accountability**.

HAD’s safeguarding work is underpinned by the following ethical commitments:

- HAD has a duty of care and responsibility to keep all individuals safe who we come into direct or indirect contact with.
- HAD employees and representatives have a duty of care to report any incident or concern that is witnessed, suspected or overheard.
- HAD implements a zero-tolerance approach to safeguarding. Suspected breaches of this policy are taken seriously, and we will take appropriate disciplinary action where needed.

5. Safeguarding Standards

HAD’s safeguarding commitments are organised around ten interlinked standards adapted from HelpAge International’s Global Safeguarding Policy:

Standard 1: Leadership, Accountability and Governance

- HAD Board and leadership hold ultimate accountability for safeguarding.
- Two designated trustees oversee safeguarding; a Safeguarding Focal Point ensures implementation.

- Safeguarding is a standing agenda item at Board and management level.
- **Accountability and transparency** are central: safeguarding progress is monitored, documented, and reported to donors, regulators, and the public where appropriate.
- HAD adheres **to international safeguarding standards** including the Core Humanitarian Standard (CHS) and IASC Minimum Operating Standards on PSEA.

Standard 2: Organisational Culture

- HAD promotes a safe, inclusive, and transparent culture where all staff feel safe to raise concerns. Managers lead by example and integrate safeguarding into daily work.
- All representatives are responsible for upholding safeguarding; **safeguarding is everyone's responsibility**.
- A **zero-tolerance** approach to abuse, exploitation and neglect. Suspected breaches of this policy are taken seriously, and we will take appropriate disciplinary action where needed.
- **Non-discrimination** and respect for equality, diversity, and inclusion are actively promoted. All individuals are entitled to equal protection.

Standard 3: Training and Awareness

- HAD will actively promote its Safeguarding Policy in ways that are accessible, informative, and easy to understand for all representatives. This will be achieved through dedicated inductions, mandatory safeguarding training, yearly refresher training, and ongoing organisational communications on safeguarding.
- All employees and representatives must complete safeguarding training before any direct engagement with programme participants or community members.
- Awareness-raising and training will be systematically included in the HAD organisational plans, and safeguarding capacity building will be integrated into programme planning with partners.
- Training will cover individual responsibilities, reporting obligations, Do No Harm, and survivor-centred approaches.
- Partners will receive appropriate awareness-raising and training support to strengthen their safeguarding capacity.

Standard 4: Safe Recruitment and Employment

- HAD commits to implementing safe recruitment practices to prevent unsuitable individuals from joining the organisation.
- Recruitment and HR practices reflect **non-discrimination** and equal opportunities.

Standard 5: Safe Programming and Risk Management

HAD commits to ensuring that safeguarding is systematically integrated into all projects, whether implemented directly in Germany or through local partners. HAD applies the Do No Harm principle to all programming, ensuring activities do not cause harm and instead strengthen dignity, safety, and protection for participants. Safe programming must actively

promote equality and equity, reduce risks, and strengthen protection for all participants, especially older people, at-risk adults, and children.

- All project proposals must include:
 - a **safeguarding risk assessment**,
 - a **budget line** for mitigating safeguarding risks, training, enhanced risk assessments, and case management [as appropriate].
- Risk assessments and mitigation plans should be developed in a **participatory manner**, involving staff, partners, and, where appropriate, community representatives.
- Given HAD's partnership-based approach, particular emphasis is placed on **partner due diligence and capacity assessment**:
 - All implementing partners must demonstrate safeguarding policies and practices that meet minimum international and HAD standards.
 - Where safeguarding measures fall short, partners are required to either **adopt HAD/HAI safeguarding standards** or agree to a **joint capacity-building plan** to close identified gaps.
 - In consortium projects, due diligence will assess the safeguarding practices of all partners. Where policies do not align with sector best practice, partners will be required to adopt HelpAge safeguarding standards.
- **Safeguarding Focal Points** will be identified, and **tailored reporting and response mechanisms** will be established and clearly communicated to participants, community members, employees, and partners.
- **Awareness-raising activities** will be incorporated into programmes for older people, at-risk adults, caregivers, social workers, and other stakeholders.
- Programmes will hold **regular open discussions** with participants, staff, volunteers, and partners to evaluate the implementation of safeguarding procedures and strengthen accountability throughout the project cycle.

Standard 6: Working with Older People and Communities

- HAD recognises that older persons are often at heightened risk of harm due to age and unequal power dynamics. We commit to ensuring all interactions are safe, inclusive, and participatory in our programmes, research, and advocacy.
- All employees, volunteers, contractors, consultants, and researchers must sign and comply with the HAD Code of Conduct, ensuring appropriate behaviour towards participants and among participants themselves.
- Partners should conduct awareness-raising activities with participants, caregivers, and communities before and during programmes to familiarise them with safeguarding policies, reporting processes, and expected standards of behaviour.
- Activities will be context-sensitive, taking into account age, gender, culture, and other individual needs, and will empower participants to provide feedback in line with international standards.

Standard 7: Reporting and Responding

- HAD ensures that **robust, accessible, and context-appropriate reporting and response mechanisms** are in place for older persons, communities, staff, and partners. This includes an organisational reporting system at HAD and, where programmes are implemented through partners, partner-owned reporting and response channels that are aligned with HAD standards. Partners are responsible for establishing, maintaining, and promoting community feedback and response mechanisms, with HAD providing support if needed. All safeguarding concerns must be reported and will be recorded and managed in line with **HAD's Reporting Policy**.
- Reporting and response processes are guided by the following principles:
 - **Reporting safeguarding concerns is mandatory for all staff, partners, and representatives.**
 - **Reports can be made confidentially and anonymously.**
 - **Equal right to protection** for all persons engaged in HAD activities.
 - **Duty of care** to respond effectively, act in the survivor's best interest, and record concerns, including those raised anonymously.
 - A **survivor-centred approach**, ensuring dignity, safety, and informed choice/consent in all cases.
 - **Confidentiality and sensitivity**, with information shared strictly on a need-to-know basis.
 - Consideration of the **country context**, including laws, frameworks, and referral services.

Standard 8: Partnerships and Contractors

- All partners will undergo due diligence to assess whether their safeguarding measures meet the HelpAge safeguarding minimum standards.
- Where gaps are identified, entities may be required to adopt HelpAge safeguarding policies or develop their own with capacity-building support.
- All partnership agreements and contracts will include a safeguarding clause covering children, older persons, and at-risk adults. Partners and contractors will be briefed on HAD/HAI safeguarding policies at the start of their engagement.
- Agreements will clearly specify procedures for case identification, reporting, and handling between HAD and the partner.
- HAD will work with partners based on trust, accountability, and capacity development, and will regularly monitor safeguarding commitments. Where commitments are not met, HAD will conduct a review and agree on an action plan to close gaps.

Standard 9: Communications, Media and Advocacy

- Consent and dignity are mandatory in all communications.
- Older people are portrayed as active agents in their lives.

- All media representatives are briefed on safeguarding expectations.
- Representation respects **non-discrimination** and avoids reinforcing stereotypes.

Standard 10: Data Protection and Digital Safeguarding

- Safeguarding data must be anonymised, securely stored, and shared only where lawful and necessary.
- Digital engagement follows the **Do No Harm** principle, minimising risks of harm.
- Staff must comply with data protection law and HAD's data protection policy.

Related policies:

- Code of Conduct
- Serious Incidents Reporting Policy
- Serious Incident Report Form
- Related site: How to report a complaint

Appendix: Glossary of Terms

Accountability: The process of using power responsibly, taken account of, and being held accountable by different stakeholders, and primarily those who are affected by the exercise of such power.

At-risk adult: An individual 18 years of age or above who is unable to protect themselves from harm, abuse and exploitation for any reason; is at increased risk due to their gender, sexual orientation, gender identity, gender expression and sex characteristics (SOGIE), age, disability, ethnicity, race, economic or social status; as a result of conflict or disaster; or experiences a power differential that puts them at risk.

Child: Every human being below the age of 18.

Abuse: Abuse is any act which individuals, institutions or processes do - or fail to do - which directly or indirectly results in a negative impact on another. Refer to forced labour, trafficking, emotional abuse, exploitation, financial/material abuse, grooming, neglect, online abuse, physical abuse, sexual abuse, spiritual abuse, and traditional harmful practices for specific definitions.

Bullying: Repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power. It can happen face to face or online.

Do No Harm: Taking steps to avoid exposing people to additional risks through the actions of those who deliver international development and/or humanitarian programmes by understanding the broader context and mitigating potential negative effects on the broader social, economic and political environment.

Emotional abuse: Persistent emotional maltreatment that impacts negatively on an individual's emotional state. This can include restriction of movement, degrading treatment, humiliation, bullying (including cyber bullying), threats, discrimination, ridicule or other non-physical forms of hostile or exclusionary treatment.

Exploitation: This encompasses, but is not limited to, the following forms of exploitation:

- Commercial exploitation of an individual occurs when that person works or does activities for the benefit of others but does not benefit in any way or experiences harm as a result of the work. This includes, but is not limited to, domestic work, forced participation in armed conflict, including the use of child soldiers, and involvement in harmful and hazardous work.
- Sexual exploitation is a form of exploitation and sexual abuse that involves an individual being engaged in any sexual activity in exchange for money, gifts, food, accommodation or any other material needs (e.g. prostitution, trafficking and the exploitation of and creation and dissemination of sexually explicit videos and pictures). This can also occur online where an act of a sexually exploitative nature is carried out against an individual. It includes any use of information and communication technology that results in sexual exploitation or results in or causes images/other material documenting the exploitation to be produced, bought, sold, possessed, distributed or transmitted.

Financial/material abuse: Includes theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, corruption or the misuse or misappropriation of property, possessions or benefits.

Grooming: Behaviour that makes it easier for an offender to procure an individual for sexual activity. It happens when there is a power differential or well-planned manipulation in a relationship, which the abuser exploits for their own satisfaction. This is a common tactic used by perpetrators against children for sexual activity. However, older persons can also be groomed. This can occur during face-to-face or online contact.

Harassment: Unwanted conduct, including threats and demands, which offends, intimidates or humiliates someone. It can be a one-off or repeated act.

Harm: Any detrimental effect on an individual's physical, psychosocial, or emotional wellbeing. Harm may be caused by abuse, exploitation, harassment, bullying, assault, or any action that puts the person at risk, whether intentionally or unintentionally.

Neglect: Persistent failure to meet an individual's basic physical and/or psychological needs or provide adequate care and support for them. This includes the failure to protect children, youth and at-risk adults from harm as well as provide adequate nutrition, shelter and safe living conditions.

Online abuse: Any form of abuse that happens whilst interacting with digital technology. It can happen anywhere, for example social media, text messages and messaging apps, email, online chats, online gaming, and live-streaming sites. Examples of online abuse include cyberbullying, grooming, sexting, sexual abuse, psychological/emotional abuse and sexual exploitation.

Protected Characteristics: The United Nations refers to international human rights legal frameworks that combat specific forms of discrimination, including discrimination against indigenous peoples, migrants, minorities, people with disabilities, discrimination against women, racial and religious discrimination, or discrimination based on sexual orientation and gender identity.

Physical abuse: Actual or potential physical harm perpetrated by another person, adult or child. This may involve hitting, shaking, poisoning, burning or other physical acts.

Safeguarding: Set of organisational policies, procedures and practices employed to ensure HelpAge is a safe organisation, responsible for protecting individuals from the risk of harm, abuse, exploitation and neglect caused by those who have a duty to protect and care for them.

Sexual abuse: Forcing or enticing an individual to take part in sexual activities. The sexual abuse of children occurs whether or not the child is aware of what is happening. This may include rape, oral sex, penetration, masturbation, kissing, rubbing and inappropriate touching. It also includes engaging an individual in the viewing or production of sexual images, witnessing sexual activities and the encouragement to behave in sexually inappropriate ways.

Survivor-centred approach: A survivor-centred approach recognizes that the survivor, the person to whom the harm has been done, has the right to be treated with dignity and respect and not be exposed to victim-blaming attitudes; express their wishes for what action they would like to happen to deal with the harm and abuse instead of feeling powerless; privacy and confidentiality; non-discrimination based on gender, age, race/ethnicity, ability, sexual orientation, HIV status or any other characteristic; and receive comprehensive information and support to help them decide what action to take instead of being told what to do.

Trafficking: Any involvement in the recruitment, transportation or receipt of an individual for the purpose of exploitation, by means of threat, force or other forms of coercion.

Inter-Agency Standing Committee (IASC) IASC is a unique inter-agency forum for coordination, policy development and decision-making involving the key UN and non-UN humanitarian partners. The IASC was established in June 1992 in response to United Nations General Assembly Resolution 46/182 on the strengthening of humanitarian assistance. General Assembly Resolution 48/57 affirmed its role as the primary mechanism for inter-agency coordination of humanitarian assistance.

Partner HelpAge develops partnerships with other organisations who are committed to our mission HelpAge develops partnerships with other organisations who are committed to our mission and to develop our work and extend our global reach. Partners who receive funding from HelpAge to deliver programmes undergo our internal due diligence process which includes safeguarding measures. We work with them to build capacity and support them strengthen their safeguarding measures throughout the life of the programme.

Protection from Sexual Exploitation and Abuse (PSEA) The term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by staff or associated personnel. The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13)

Survivor The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive. However, it is the individual's choice how they wish to identify themselves.