

Client, Vulnerable Adult and Child Protection Policy

(23 March 2020)

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1. Vision, Mission and Values

Our Vision

What are we working towards?

Communities free and healed from the trauma of human trafficking, slavery and abuse.

Our Mission

Why do we exist?

For those affected by trauma and those who support them, Hagar is an expert in care and recovery.

When healing happens the cycle of trauma stops.

Our Values

What do we stand for and how do we behave?

Respect - We believe in the right of all people to be heard and treated with respect and dignity.

Integrity - We commit to act ethically and honestly, striving to do the right thing at all times and in all circumstances.

Compassion - We want compassion and kindness to be evident in our attitude, communication and in active, practical ways.

Excellence - We hold ourselves to high standards, listening and learning from those we support, our partners and each other, and to continuously improve all that we do.

2. Statement of Commitment

Hagar is committed:

- To affirm our duty of care and to promote the protection and wellbeing of all clients, and in particular of children in a way that recognizes their right to live/grow up in a safe and stable environment, and are protected from harm.
- To identify and mitigate immediate and cumulative risks to clients.
- To ensure that Hagar's operations respond to clients and children's needs, in a way that fosters their health, development and dignity.
- To promote safe, nurturing, family-based or community-based care for clients, specifically children.
- To ensure compliance with the host country's laws and with international standards, such as the UN Convention on the Rights of the Child and The Convention on the Elimination of All Forms of Discrimination against Women, whichever affords greater protection.
- To uphold the principle of non-discrimination.
- To create a safe environment in which staff and clients are encouraged to report any concerns.
- To create a culture of openness and learning.

3. Purpose

The purpose of this Client and Child Protection Policy is to provide a framework that aims to protect all Hagar clients, minors and adults, and reduce the risk of abuse in Hagar activities by:

- Outlining Hagar's expectations of all staff and other stakeholders regarding the standards and responsibilities outlined in this policy.

- Educating staff and other stakeholders about client and child protection.
- Setting minimum standards for organisation-wide reporting procedures.
- Demonstrating Hagar's commitment to client and child protection.

4. Scope

Those who follow within the scope below are required to read, sign and adhere to this policy:

- All Hagar staff herein included all employees from Country Offices, Support Offices and Hagar International.
- Contractors and consultants.
- All Hagar volunteers and interns.
- All Hagar foster carers.
- All Hagar strategic partners, with whom Hagar conducts joined activities working with clients and children
- All Hagar Board members and visitors.

5. Code of Conduct

This Code of Conduct outlines the behavior expected from all Hagar staff and stakeholders as defined above.

I will:

- Treat all clients and children with respect regardless of race, color, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth, sexual orientation, gender identity or other status.
- Listen to clients and children, and facilitate them opportunities to participate in decision-making that affects them, as possible.
- Comply with the 'two-adult rule'. I will ensure that another adult is present or within reach when I am working with child/ren, at all times. If another staff is unavailable, I will stay in public view or request a trusted family member, community member, or staff member from a partner to accompany the child/ren and me.
- Abide by all relevant laws and international standards.
- Always respect a client's right to privacy and confidentiality, and not put a client or child at risk of identification where this could lead to harm or retribution.
- Immediately report any concerns or allegations I have of client, child or vulnerable adult abuse in accordance with the responsible Hagar Office.
- Immediately disclose to Hagar all charges and convictions which occurred before, or occur during my employment or association with Hagar.

I will not:

- Engage in any acts that fall within the broad definition of abuse, exploitation or neglect (see Glossary).
- Solicit or engage in any form of transactional sex.
- Access or create child pornography through any medium.
- Engage clients or any children in any form of sexual intercourse or sexual activity, including non-contact activity such as grooming, sexting, or online sexual activity. Hagar regards all

persons under 18 years 'underage', regardless of the legal age of consent of the country in which the sexual activity occurs.

- Touch (e.g. hold, hug or kiss) a client or any child in any way that is unnecessary or inappropriate, to the culture or circumstances.
- Sleep in the same bed as a client or child (noting that this does not apply to my own child/ren).
- Hit, slap or otherwise physically assault, abuse or physically discipline clients or child clients, even where this may be culturally accepted.
- Use language or behavior, which shames, humiliates, belittles or degrades clients or children.
- Spend time alone with a client or child, take a client or child into my own home, or visit a client or child where I may be alone with the client or child.
- Employ children under 18 years as domestic workers in my home.
- Exchange my personal contact details with clients or children. I will not become friends with, or connect with clients or children on social media, including Facebook and Instagram.
- Be intoxicated or under the influence of drugs while working with clients and children.
- Participate in, or facilitate orphanage tourism.

6. Client and Child Safe Recruitment and Screening

Hagar is committed to recruitment protocols that protect all clients, children and vulnerable adults. Hagar recognizes that sex offenders often seek to work at organisations that work directly with children and vulnerable adults.

Hagar's screening of short-listed candidates includes at a minimum:

- A Police Check, or equivalent, both from their home country as well as their country of previous employment.
- Additional checks designed for people working with children, as available in their home country or country of previous employment.
- At least three reference checks with suitable references, including the previous employer, documented, and on their personnel file.
- Asking the referees specific questions regarding the candidate's suitability to work with/be in contact with children and vulnerable adults.
- A detailed resume/application form, providing verifiable information about the applicant's previous employment, education and experience.
- In addition, Hagar will conduct interviews including behavioral-based questions related to client and child protection.

When asked for a reference by a prospective employer, Hagar will explicitly not recommend a (former) staff member, who during their employment with Hagar, received a warning or terminated because of breaches of this policy.

All letters of reference are required to be signed by the Chief Executive Officer, or relevant Executive Director.

7. Communication

Hagar staff and stakeholders will portray clients and children in a way that respects their rights, dignity, well-being and safety, at all times.

- All Hagar staff, volunteers and foster carers, consultants and external researchers are required to read, sign, understand and adhere to Hagar International Communications Policy (see appendix 1).
- All contracted photographers/videographers are required to read, sign, understand and adhere to Hagar International Communications Policy.
- All visitors are required to be familiar with the Hagar International Communications Policy and adhere to it, especially with regard to communications on social media.

8. Fostering and Adoption

Hagar staff and Hagar staff relatives who are living with them, are not permitted to foster or pursue adoption of any child who is a beneficiary of a Hagar project, to avoid a conflict of interest. Hagar encourages and supports staff who wishes to foster or adopt a child through another organisation, if the adoption/foster process complies with the laws of the host country.

9. Dissemination and Training

Hagar will ensure that all staff and stakeholders read and sign this client and child protection policy, and other relevant policies before they start to work or engage with Hagar.

All new staff members, volunteers, contractors and consultants will receive a briefing on client and child protection and reporting procedures during their induction programme. They will receive further training on client and child protection, and country specific-reporting procedures within three months of their employment.

10. Risk Management

Careful and ongoing risk management can reduce the risk of abuse and exploitation. Therefore, Hagar will:

- Conduct an initial client and child protection risk assessment.
- Implement ongoing risk management strategies including regular policy and procedure reviews.
- Analyze reported incidents for trends in risks and adjust activities, projects and programmes accordingly.

11. High Risk Programme Areas

We consider a programme area 'high risk' based on different criteria, such as the level of direct contact with clients, the level of visibility (e.g. taking place in somebody's home) the physical environment, the presence of armed conflict, exploitation etc.

A) Foster Care

Hagar may provide foster care to those children for whom safe family-based options are not available. To mitigate risks to our clients in foster care, Hagar is committed to:

- Follow a strict screening and recruitment process as outlined in the Foster Care Policy, including pre-screening, police checks, background checks in the community, an in-depth assessment and a final authorization by a panel of a minimum of four persons.
- Provide extensive training, including on the Client and Child Policy, before any child/ren are placed with the foster family.
- Ensure that clients and children in foster care have opportunities to report incidents.

B) Residential Care

Hagar is committed to promote safe, nurturing, family-based or community-based care for children. However, in certain exceptional cases, these options are not available, or not in the best interest of the child.

- Residential care should be a last resort, in the best interest of the child/ren, and for an appropriate period.
- We will apply these principles to relevant Hagar residential care programmes, as well as to any partner providing residential care to Hagar and/or shared clients.
- We will only partner with organisations who have residential care units with robust gatekeeping and reintegration policies and practices in place.
- Residential care programmes must comply with national laws, national minimum standards, and Hagar minimum standards.

C) Economic Empowerment

Hagar takes a zero tolerance approach to labour exploitation and sexual harassment.

- All potential employers, organisations hosting work placements, vocational training centres and other relevant economic empowerment service providers, will fulfill Hagar's established partnership criteria. Each entity will be required to demonstrate commitment to established minimum standards.
- A Partnership Agreement will be signed with each entity, before economic empowerment activities take place, which state minimum standards expected, to ensure the safety and security of each client placed under their care.
- Hagar will conduct regular monitoring visits to ensure compliance standards related to safety and security of clients, are being fully met.
- Allegations of misconduct by clients, staff, partners, etc. will be investigated according to Hagar's rigorous investigation and reporting guidelines. Clients may be removed from the entity until the investigation is completed.
- Investigations identifying labour exploitation, sexual harassment or any other criminal issues will be reported to the authorities. Hagar will provide records of the investigation as relevant.

D) Education

Hagar takes a zero tolerance approach to clients being exploited, violated, or abused.

- Hagar will conduct due diligence upon all education institutions, where clients and/or children are studying, and upon individual teachers providing private tuition.
- Hagar will conduct regular monitoring visits to ensure compliance standards related to client and child wellbeing, are being fully met.
- Allegations of misconduct by clients, staff, partners, etc. will be investigated according to Hagar's rigorous investigation and reporting guidelines. Clients may be removed from the entity until the investigation is completed.
- Investigations identifying exploitation, violence, or abuse, will be documented fully and reported to the authorities. Hagar will provide records of the investigation as relevant.

12. Research, Monitoring and Evaluation

Before interviews, filling out questionnaires or participating in focus group discussions, clients and all participants are informed about the purpose of the activity and who will have access to the information they provide. They will be informed that participation is voluntary; they have the right not to answer certain questions, and to end their participation in the activity at any time if they feel uncomfortable.

All clients will sign a consent form before interviews, filling out of a questionnaire, or participating in focus group discussions, takes place. For clients under-18 years of age, informed consent from parents/guardians and clients themselves, is required. If the researcher, monitors, or evaluator doesn't provide her/his own forms, Hagar Research Consent Forms will be used (see Appendix 1 Communications Policy/Appendix 7 Research)

To ensure researchers, monitors or evaluators do not consciously or unconsciously, cause distress to a client and/or children and participants, they will only be given access to clients and/or children within Hagar's care, if they agree to:

- Disclose all interview questions that are asked of clients and/or children within Hagar's care, before the interview takes place. Hagar personnel must give approval to all interview questions in advance of interviews. Hagar has the right to modify or delete any questions.
- Halt interviewing at the request of Hagar personnel, client and/or children concerned if they feel the activity is inappropriate or causing distress.
- Not disclose the name/s and specific geographic location of clients and/or children within Hagar's care.
- For clients and/or children under 18 years of age, a trusted caregiver/adult will always be present during one-on-one interviews. This can be a Hagar staff member, but if the independent nature of the evaluation does not allow Hagar staff to be present, this can be another trusted adult.
- With adults over 18 years of age, a Hagar staff will explain the ground rules of the interview in the presence of the client and the researcher/monitor/evaluator and will remain close-by, but not necessarily in the room, to be available in case the client requires assistance.
- With clients and/or children selected for randomized samples, Hagar will review the list of selected clients and/or children. Hagar retains the right to refuse participation of a client and/or children based on Hagar's assessment of the clients and/or children's emotional well-being.
- In the event that a client and/or child discloses a child protection related issue (e.g. abuse) during the intervention or interview the researcher/evaluator must inform Hagar staff immediately.

13. Minimum Standards for Reporting Procedures

Every country office will utilise Hagar International's established Complaints Procedures for Client and Child Protection and Feedback (appendix 2) to report any allegation of abuse of our clients, and for reporting other concerns about a client's or child's safety or well-being. Hagar's Complaints Procedures for Client and Child Protection and Feedback states:

1. Who has a duty to report (all Hagar staff and stakeholders).
2. Who can report (clients, children, client's and/or children's relatives, community members close to clients, Hagar partners, stakeholders).
3. What to report.
4. When to report.
5. Who to report allegations to.
6. Who is responsible for investigating allegations.
7. Who is responsible for responding to an incident, and possible outcomes.

Staff must report concerns, allegations of abuse or suspected breaches of the Client and Child Protection Policy immediately/as soon as possible.

Each incident report will be documented, using the standard form in Hagar's Client Management System. Each investigation into alleged abuse will be fully documented.

When there is a belief or suspicion of abuse or a breach of this policy:

1. An investigation will be launched.
2. If the person alleged to have committed the abuse is a staff member, the Chief Executive Officer/Executive Director will be informed immediately and involved in conducting the investigation.

While the investigation is ongoing, information will be handled with sensitivity, and confidentiality maintained. The Executive Director will ensure the Chief Executive Officer is informed throughout the investigation.

Persons subject to an investigation may be stood down during the course of the investigation. This will be determined by the Executive Director, in consultation with the Chief Executive Officer.

Allegations of a criminal nature will be reported to the police.

14. Compliance

Hagar staff who violate any of the provisions of this policy shall be subject to disciplinary measures, including termination.

Each country office will appoint a designated person who will provide training to staff and other stakeholders on this policy.

15. Review of the Client/Child Protection Policy

This policy will be reviewed every three years'.

Glossary

Abuse - Anything, which individuals, institutions or processes do or fail to do which directly or indirectly, harms clients/children. We can distinguish five categories of abuse/violence:

1. **Physical Violence:** The use of physical force that causes actual or likely physical injury or suffering. It may involve hitting, shaking, poisoning, choking, drowning and burning.
2. **Sexual Violence:** Forcing or enticing a client/child to take part in sexual activities that he or she does not fully understand and/or has little choice in consenting to. This may include, but is not limited to, rape, oral sex, penetration or non-penetrative acts such as masturbation, kissing, rubbing and touching. It may also involve looking at or producing sexual images, watching sexual activities and encouraging children to behave sexually.
3. **Emotional Violence:** Defined as a pattern of verbal behaviour over time or an isolated incident that is not developmentally appropriate and supportive and that has a high probability of damaging a person's mental health, or his/her physical, mental, spiritual, moral or social development. This can also include witnessing violence perpetrated against others.
4. **Neglect:** Defined as the failure to provide for the development of the child in all spheres. This includes health, education, emotional development, nutrition, shelter, and safe living conditions, in the context of resources reasonably available to the family or caretakers and causes or has a high probability of causing harm to the child's health or physical, mental, spiritual, moral or social development. This includes the failure to properly supervise and protect children from harm as much as is feasible.
5. **Exploitation:** Commercial or other exploitation of a child refers to use of the child in work or other activities for the benefit of others. This includes, but is not limited to, child labour and child prostitution. These activities are to the detriment of the child's physical or mental health, education, or spiritual, moral or social-emotional development. Child exploitation also includes the recruitment and use of children in armed conflict, child trafficking and the sale of children

Best Interest of the child: Laws, policies, decisions and actions affecting children should put their interests first and benefit them in the best possible way.

Child: Anyone under 18 years of age

Child client: Persons under 18 years of age receiving direct services from Hagar.

Child Pornography: Any visual depiction of sexually explicit conduct involving a minor.

Clients: Persons receiving direct services from Hagar, both adults and children.

Duty of Care: The responsibility of the organisation to provide clients/children with an adequate level of protection against harm.

Gatekeeping: Controlling access to certain types of services, such as residential care.

Grooming: A process where the offender prepares the victim for sexual activity later. Grooming does not necessarily involve sexual activity or a discussion of sexual activity. It may be establishing a relationship of trust with a child or parent with the intent to gain access and facilitate sexual activity later. Grooming can be conducted in person or online, for example via social media.

Online sexual abuse: When sexual exploitation happens online, young people may be persuaded, or forced, to send or post sexually explicit images of themselves; take part in sexual activities via a webcam or smartphone; have sexual conversations by text or online. Abusers may threaten to send

images, video or copies of conversations to the young person's friends and family unless they take part in other sexual activity. Images or videos may continue to be shared long after the sexual abuse has stopped.

Orphanage tourism: The donation of money and goods, attending performances or volunteering at a residential care institution on a short-term basis as part of one's holiday.

Physical discipline/corporal punishment: The use of physical force, physical pain and discomfort to punish children for their behavior (.e.g. slapping, spanking, shoving, making children stand in the sun).

Privacy: Personal information or opinion about an identified individual, or an individual who is reasonably easily identifiable.

Transactional Sex: Sexual acts performed in exchange for money, goods or favors.

Appendixes

Appendix 1: International Communications Policy

Appendix 2: Complaints Procedures for Client and Child Protection and Feedback Complaints

Appendix 1: Communication Policy



Communications Policy

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Introduction

At Hagar, we believe in the inherent dignity of each woman and child as individuals created in the image of God. This is at the root of our commitment to protecting and providing excellent services to each client who enters our care.

At Hagar we also value partnerships. Our mission comes to life when passionate people join the journey of recovery and make Hagar a part of their own story.

“We have a vision that is amazing and exciting. We are inviting you to invest yourself through the resources that God has given you – your energy, your prayers and your money – in this work to which God has called us. ”

Henri Nouwen, *The Spirituality of Fundraising*

Due to the sensitive nature of our work, Hagar will always hold in tension media and story requests alongside our duty to act in the best interest of the clients who have come to us for healing, shelter, care, counsel and protection.

Purpose:

The purpose of this document is to enable all Hagar staff and stakeholders to pursue excellence in communicating the stories of Hagar clients. We do this to invite new and existing stakeholders to join our vision and invest in the work that God has called us to, while ensuring that all clients, staff and stakeholders are treated with dignity and respect.

Scope:

This policy applies to all Hagar staff, board members, volunteers, interns, consultants, visitors, and media.

Our Clients:

The stories and images of our clients belong to them – not Hagar or its visitors. The best communications tools and media opportunities protect, encourage and respect each client and their right to privacy and participation in decisions that affect them. When working with Hagar clients, ask the following question before proceeding:

“If this client was a member of my family, how would I want their story to be treated? What practices would I want in place to ensure their privacy, protection and participation in this opportunity?”

Accountability

To preserve the dignity and protection of Hagar’s clients, staff and Brand, the following process will be enforced for media engagements:

1. The Hagar country office where the media request originates (Hagar Source Country) coordinates with the Hagar country office that will host the media visit (Hagar Host Country) in conjunction with Hagar International Communications to seek approval for the media visit. Once approval has been granted by the Hagar Host Country, the Hagar Source Country provides the media representative with the Hagar International Communications Policy and Media Code of Conduct to read and sign. The Hagar Source Country will send a copy of these signed policy documents to the Hagar Host Country and Hagar International Communications for their records.
2. The Hagar Host Country with the support of Hagar International Communications will provide an orientation to media personnel prior to any visit to Hagar projects or interviews with staff or clients. This includes a review of Communications, Visitor and Protection Policies.

3. The Hagar Host Country will manage the consent process, coordination of all interviews with clients and staff and will escort the media crew to Hagar's projects.
4. The Hagar Host Country and Source Country will collaborate to ensure that content produced from the media engagement (images, video, quotations, interviews, stories, etc.) that features Hagar staff or clients is reviewed and fact-checked for accuracy and protection, and approved prior to publishing or broadcast.

Principles & Guidelines for Photographing & Interviewing Hagar Clients

1. Principles

The well-being of all clients shall be prioritised above all. Hagar, Hagar staff, and members of the media will choose stories and images that respect the dignity of all individuals concerned and that reflect the equality of all people.¹

- 1.1 The images and stories of Hagar clients belong to them – not to Hagar, Hagar staff or stakeholders, visitors, donors, or the media. The golden rule when communicating Hagar client stories is that each client is owner of their own story and has the right to participation, protection and privacy.
- 1.2 The dignity and rights of all Hagar clients are the first priority and are to be upheld and respected in every circumstance.²
- 1.3 The best interest of the client is the primary consideration, over and above any agenda to raise funds, raise awareness, advocate about an issue, or to promote human rights.
- 1.4 Clients have the right to self-expression, to voice their own story and to participate in decisions that affect them. Where children are involved, their age and maturity need to be taken into consideration and those closest to the child must be consulted when determining what is in their best interest.
- 1.5 All communications should consider a client's right to privacy and confidentiality, and not put any client at risk of identification where it will or could lead to harm or retribution.
- 1.6 All Hagar clients will have their identity protected. In keeping with Hagar's Brand Strategy and Design Guidelines, all images of children (aged 17 and under) will be obscured.
- 1.7 Under certain circumstances (See Principles 1.4) Hagar clients may choose to tell their story and disclose their identity. These occasions will be based on the following conditions:
 - 1.7.1 Approval by the client's counselor based on a Child Exploitation Psychosocial Assessment Tool (CEPAT) assessment.
 - 1.7.2 The client's ability to make an informed choice, based on the CEPAT assessment.
 - 1.7.3 The client has reached the age of consent (18 years old) according to Article 1 of the United Nation's Conventions on the Rights of the Child.³ Where a child 17 years of age and under is concerned, a guardian (a housemother, foster parent, etc.) must consent in conjunction with the child's wishes. Even then, in keeping with item 1.6, their image will remain obscured.
 - 1.7.4 Demonstration by the storyteller of how Hagar's client telling their story and relevant dissemination will be empowering for the client.

¹ Code of Conduct on Images and Messages. Dochas: The Irish Association of Non Governmental Development Organisations. 2006.

² Including Convention on the Rights of the Child, UNICEF.

³ Article 1, UN Conventions on the Rights of the Child. Available online: <http://www.2ohchr.org/english/law/cre.htm#part1>

2. Media Access Guidelines For Journalists, Photographers and Videographers⁴

- 2.1 Media access to a woman or child in Hagar's care for the purpose of filming, photographing or interviewing will be granted only if the client agrees and when Hagar agrees it is in the client's best interest.
- 2.2 Media will only be given access to interview, film and photograph if they agree to:
 - 2.2.1 Disclose all interview questions the subject will be asked at least 48 hours **prior** to the interview. Hagar reserves the right to modify or delete questions.
 - 2.2.2 Halt interviewing, filming or photographing at the request of the client or Hagar staff member if they feel the activity is causing distress or is inappropriate.
 - 2.2.3 Read and follow Hagar's Communications Policy in its entirety and sign the Media Code of Conduct.
 - 2.2.4 Media will provide Hagar with copies of the publication, broadcasts and photographs after the visit for final review and approval **prior** to distribution.
 - 2.2.5 Provide Hagar with copies of the publication, photographs or broadcast immediately.
- 2.3 Any information collected outside of this process is considered off the record and cannot be used or disseminated in any media produced.

3. Guidelines for Interviewing/Filming Hagar Clients

- 3.1 **DO NO HARM:** This is our first priority when representing our clients. Before conducting an interview/film always ask, "Is this necessary?"
- 3.2 **FULL DISCLOSURE:** Hagar clients, both women and children who will become the subjects of text, photo and/or video communications materials gathered by Hagar staff and stakeholders and the media should understand the purposes and intentions for which the materials are being gathered and how they will be used, known and seen by others outside the community.

Subjects should know about the proliferation of electronic media and that information may be reprinted online, translated into other languages, and made accessible to people around the world, including individuals in the subject's home country through email and the internet.
- 3.3 **PERMISSION:** Informed, written consent is required for all photos, videos and stories of clients. Not only is this industry best practice, but it also builds trust, develops resilience and voice among clients, and ensures that Hagar staff avoid doing harm, damaging reputations, invading personal privacy and potentially incurring libel and copyright problems.
- 3.4 **ALWAYS** have a trusted adult/caregiver present when interviewing/photographing or filming a Hagar client.
- 3.5 **RESPECT:** Treat with care and respect people being interviewed and their caregivers. Avoid questions, attitudes or comments that are judgmental, insensitive to cultural values, may cause offense or humiliation, or re-traumatize from past grief or traumatic event.

⁴ Media and Communications Policy. Chab Dai Coalition. Draft; September 7, 2010.

- 3.6 NO STAGING: Do not ask a client to represent a story that is not their own.
- 3.7 SELF EXPRESSION: As much as possible, make every effort for the subject to feel at ease to express their own opinion/share their story from their viewpoint.
- 3.8 IN THEIR INTEREST: Pay careful attention to where and how an interview/filming is conducted. Ensure that the subject is at ease with the questions/filming and that they have the freedom to express their own views, without any coercion from the interviewer, guardian or project staff.
- 3.9 SCOPE: Bear in mind that reporting on Hagar clients carries the added challenge that in the current era, it is nearly impossible to limit a story's reach.⁵
- 3.10 PROTECTION: Never publish a story or use an image that may put a client or their family at risk – even when identities are changed or obscured.

4. Guidelines for Reporting on Survivors of Trafficking

ENSURE ANONYMITY & CONFIDENTIALITY – Because of the significant and long-term potential consequences of appearing in photographs or film footage, and in keeping with international media best practices, always change the name and obscure the visual identity of individuals who have survived human trafficking.⁶

- 4.1 Publishing conventions that protect the identity of a trafficked person include profile shots, darkened images, and photos taken from the back or that crop part of the face.
- 4.2 State in copy that the names have been changed to protect the identity of the victim.
- 4.3 In certain circumstances, disclosing a trafficking survivor's identity/image, may be in their interests when:
- 4.4 Individuals 18 years and older expressly choose to exercise their right to freedom of expression and their right to have their opinion heard.⁸
- 4.5 Individuals have been informed of any and all potential risks and assumptions.

5. Guidelines for Reporting On Children

- 5.1 When interviewing a child, ensure that the appropriate permission has been obtained from their guardian/counselor. Explain the purpose of the interview/filming with the child and its intended use. **Appropriate permission includes abiding by [Section 1.6](#) of this Communications Policy.**
- 5.2 Pay attention to where and how the child is interviewed. Limit the number of interviewers and photographers. Try to make certain that children are comfortable and able to tell their story without outside pressure, including pressure from the interviewer. In film, video and radio interviews, consider what the choice of visual or audio background might imply about the child and her or his life and story. Ensure that the child will not be endangered or adversely affected by showing their home, community or general whereabouts.⁷

⁵ **Including:** WHO ETHICAL AND SAFETY RECOMMENDATIONS FOR INTERVIEWING TRAFFICKED WOMEN. World Health Organization. 2003. Online: <http://www.who.int/gender/documents/en/final%20recommendations%2023%20oct.pdf>

⁶ Guidelines for Media Professionals While Interacting with Survivors of Trafficking and Reporting on Trafficking. UNODC. Online: http://www.unodc.org/india/womensday08_4th_media.html

⁷ UNICEF. Reporting On Children And Young People (http://www.unicef.org/eapro/Reporting_on_children_and_young_pp.pdf)

⁸ The age of consent according to the UN Conventions on the Rights of the Child In event a trafficking survivor, fully understanding the scope of the project and giving their informed consent, wishes to share their story, **section 1.6** of this Communications Policy must be strictly adhered to.

5.3 Identity: Always change the name and obscure the visual identity of a child who is identified as a victim of sexual abuse or exploitation (including trafficking and rape).

6. Guidelines for Reporting on Vulnerable Women

- 6.1 STIGMITIZATION: Do not further stigmatize a Hagar client by categorizing them or using descriptions that could be perceived as discriminatory or may cause offense or psychological harm. Avoid sensational representations of a case study or issue.
- 6.2 CONTEXT: Always provide an accurate context for a story or image. Also ensure that disclosing the context does not place the subject in any danger.
- 6.3 NEVER MISLEAD: Do not use a general image with a title or caption that suggests that the people in the photo are victims of exploitation/trafficking, etc. if you do not know that they definitely are. This could place them at risk and in any case is misleading.
- 6.4 ACCURACY: Confirm the accuracy of what the subject is communicating to ensure that translation/cultural issues are not misinterpreted. Always verify the facts of a case study with the appropriate counselor/social worker to ensure that the story, as you understand it, is factual.
- 6.5 DO YOUR RESEARCH: Know the topic thoroughly before starting any communications activity. When using statistics, cite where they are sourced from and the year. Avoid using language that over simplifies an issue, could lead to further confusion or is overly general. Do not plagiarize but state if a view is Hagar's own or that of another NGO or agency.
- 6.6 IF IN DOUBT: When in doubt about a story placing a child or person at risk, do not use it, but rather talk about the issue more generally. It is our responsibility to safeguard a person's dignity and safety, not theirs.
- 6.7 AVOID: Do not use images that sexualize children. Do not use images that portray clients in a vulnerable or abused state.
- 6.8 NO FEE: No payment is to be made to a child, their parents or guardians for their story/image.

7. Guidelines on Reporting & Photographing Children With Disabilities⁸

When reporting on clients with disabilities, Hagar staff and stakeholders have a unique opportunity to advocate with/and on behalf of individuals with disabilities around the world. Individuals with a disability are individuals first – unique and with an individual personality and particular abilities.

⁸ ¹² Sources:

- A Way With Words: Guidelines for the Portrayal of People with a Disability. Disability Services, Queensland, Australia. Accessed online August 26, 2010: http://www.disability.qld.gov.au/community/communication/waywords/documents/way_with_words.pdf. Page 8
- Guidelines for Reporting and Writing about People With Disabilities. Research and Training Centre for Independent Living (Lifespan Institute). Accessed online August 26, 2010: <http://www.rtcil.org/products/RTCIL%20publications/Media/Guidelines%20for%20Reporting%20and%20Writing%20about%20People%20with%20Disabilities.pdf>
- Australian Press Council Reporting Guidelines; General Press Release #18; 1972. Accessed online August 26, 2010 at: <http://www.presscouncil.org.au/pcsite/activities/guides/gpr18.html>
- Subnormal, the retarded, crippled, deformed, suffers from, or victim of, are inappropriate terms to describe individuals with disabilities.
- Normal, able-bodied, temporarily able-bodied, healthy, or whole, are inappropriate terms to describe nondisabled persons.

Do:

- 7.1.1 Always keep the client first. Focus on the individual, not the disability. This does not mean that the disability should not be mentioned, but that it should not be the main focus of the story.
- 7.1.2 State in any written, audio or video copy, “a person with a disability” and not a “disabled person”.
- 7.1.3 Use appropriate terminology:
 - Down syndrome describes a genetic or congenital condition present from birth. It usually causes a delay in physical, intellectual, and language development.
 - Developmental disability, Intellectual Disability, or an individual or child with special needs
 - Nondisabled is the appropriate term for people without disabilities.
 - “Individual/child with Down Syndrome”, or “individual/child with Autism”.
- 7.1.4 Emphasize abilities not limitations. Show people with disabilities interacting with nondisabled persons in social and work environments.

7.2 Do Not:

- 7.2.1 Use inappropriate terminology: “Down Syndrome individual” or “Autistic individual/child”.
- 7.2.2 Portray persons with disabilities in ways that set them apart from the mainstream.
- 7.2.3 Use condescending euphemisms like “mentally different, physically inconvenienced, and physically challenged”.
- 7.2.4 Over-emotionalize or over-sensationalize a story.
- 7.2.5 Avoid unnecessary labelling.
- 7.2.6 Use inappropriate terminology:

Appendix 1

Hagar Communications Adult Story Consent Form (Trafficking)

I, _____, aged _____ understand that my story, photo and voice are
(Client Name)

my own and hereby grant my permission to Hagar to (check all that apply):

- | | |
|--|--|
| <input type="checkbox"/> Interview me | <input type="checkbox"/> Take an audio recording of my voice |
| <input type="checkbox"/> Take pictures of my image | <input type="checkbox"/> Videotape me |

I understand that the information I provide may be edited and shared by Hagar both immediately and in the future with audiences around the world, in print, audio and broadcast forms as well as on online platforms (email, social networking sites, newsletters, etc.) and in promotional materials (newsletters, fact sheets, brochures, PowerPoint presentations, etc.). It may also be shared by Hagar and select partner organisations of Hagar for the purpose of educating audiences about human rights abuse and Hagar's recovery, empowerment and reintegration programmes.

I consent under the condition that the following requirements are met

(check one):

- My image is used without being obscured.
 My image is obscured so as not to reveal my identity.

(check one):

- My real name is used.
 A pseudonym is used to protect my identity.

Other conditions:

-
-
-

(Client Signature and name, printed)

(Date)

(Hagar Counselor Witness Signature and name, printed)

(Date)

Appendix 2

Hagar Communications Child Story Consent Form (Trafficking)

I, _____, aged _____ understand that my story, photo and voice are
(Client Name) my own and hereby grant my permission to
Hagar to (check all that apply):

- Interview me
- Take obscured pictures of my image

- Take an audio recording of my voice
- Videotape me

I understand that the information I provide may be edited and shared by Hagar both immediately and in the future with audiences around the world, in print, audio and broadcast forms as well as on online platforms (email, social networking sites, newsletters, etc.) and in promotional materials (newsletters, fact sheets, brochures, PowerPoint presentations, etc.). It may also be shared by Hagar and select partner organisations of Hagar for the purpose of educating audiences about human rights abuse and Hagar's recovery, empowerment and reintegration programmes.

I consent to tell my story and understand that Hagar will abide by the following requirements according to local laws and international best practices: My image will be obscured so as not to reveal my identity.

- A pseudonym will be used to protect my identity.

Other conditions:

-
-
-

(Client Signature and name, printed)

(Date)

(House Parent/Guardian Signature and name, printed)

(Date)

(Hagar Counselor Witness Signature and name, printed)

(Date)

Appendix 3

Hagar Communications Adult Story Consent Form (General)

I, _____, aged _____ understand that my story, photo and voice are
(Client Name)

my own and hereby grant my permission to Hagar to (check all that apply):

- | | |
|--|--|
| <input type="checkbox"/> Interview me | <input type="checkbox"/> Take an audio recording of my voice |
| <input type="checkbox"/> Take pictures of my image | <input type="checkbox"/> Videotape me |

I understand that the information I provide may be edited and shared by Hagar both immediately and in the future with audiences around the world, in print, audio and broadcast forms as well as on online platforms (email, social networking sites, newsletters, etc.) and in promotional materials (newsletters, fact sheets, brochures, PowerPoint presentations, etc.). It may also be shared by Hagar and select partner organisations of Hagar for the purpose of educating audiences about human rights abuse and Hagar's recovery, empowerment and reintegration programmes.

I consent under the condition that the following requirements are met

(check one):

- My image is used without being obscured.
 My image is obscured so as not to reveal my identity.

(check one):

- My real name is used.
 A pseudonym is used to protect my identity.

Other conditions:

-
-
-

(Client Signature and name, printed)

(Date)

(Hagar Counselor Witness Signature and name, printed)

(Date)

Appendix 4

Hagar Communications Child Story Consent Form (General)

I, _____, aged _____ understand that my story, photo and voice are
(Client Name) my own and hereby grant my permission to
Hagar to (check all that apply):

- Interview me
- Take obscured pictures of my image

- Take an audio recording of my voice
- Videotape me

I understand that the information I provide may be edited and shared by Hagar both immediately and in the future with audiences around the world, in print, audio and broadcast forms as well as on online platforms (email, social networking sites, newsletters, etc.) and in promotional materials (newsletters, fact sheets, brochures, PowerPoint presentations, etc.). It may also be shared by Hagar and select partner organisations of Hagar for the purpose of educating audiences about human rights abuse and Hagar's recovery, empowerment and reintegration programmes.

I consent under the condition that the following requirements are met

(check one):

- My image is used without being obscured.
- My image is obscured so as not to reveal my identity.

(check one):

- My real name is used.
- A pseudonym is used to protect my identity.

Other conditions:

-
-
-

(Client Signature and name, printed)

(Date)

(House Parent/Guardian Signature and name, printed)

(Date)

(Hagar Counselor Witness Signature and name, printed)

(Date)

Appendix 5

External Media Consent Form (Adult)

I, _____, aged _____ understand that my story, photo
(Client Name)
and voice are my own and hereby grant my permission to _____ to
(News Agency)

(check all that apply):

- Interview me
- Take pictures of my image
- Tape-record my voice
- Videotape me

I understand that _____ will take the information I provide and may edit and
(News Agency)

share my story both immediately and in the future with audiences around the world using print, audio, broadcast and online formats.

I consent under the condition that the following requirements are met (check

all that apply):

- My image is used without being obscured.
- My image is obscured so as not to reveal my identity.
- My real name is used.
- A pseudonym is used to protect my identity.
- I am given the interview questions 2 days before the interview.
- I see the footage/interview/photographs prior to publication or broadcast.

Other conditions:

-
-
-

(Client Signature and name, printed)

(Date)

(House Parent/Guardian Signature and name, printed)

(Date)

(Hagar Counselor Witness Signature and name, printed)

(Date)

(Journalist Signature and name, printed)

(Date)

*Only required for Hagar clients 17 years of age and under

Appendix 6

External Media Consent Form (Trafficking + Children)

I, _____, aged _____ understand that my story, photo
(Client Name)
and voice are my own and hereby grant my permission to _____ to
(News Agency)

(check all that apply):

Interview me Tape-record my voice Videotape me

I understand that _____ will take the information I provide and may
(News Agency)

edit and share my story both immediately and in the future with audiences around the world using print, audio, broadcast and online formats.

Clients aged 18 and Over:

I, _____, consent under the condition that the following requirements are met:

(check one):

My image is used without being obscured.

My image is obscured so as not to reveal my []

(check one):

My real name is used.

A pseudonym is used to protect my identity. identity.

Clients aged 17 and Under:

I, _____, consent to tell my story and understand that the news agency will abide by the following requirements according to n law and international best practices: My image will be obscured so as not to reveal my identity.

- A pseudonym will be used and my image obscured so as to protect my identity.

(Client Signature and name, printed) (Date) _____

(House Parent/Guardian Signature and name, printed) (Date) _____

(Hagar Counselor Witness Signature and name, printed) (Date) _____

(Journalist Signature and name, printed) (Date) _____

*Only required for Clients 17 years of age and under.

Appendix 7

Hagar Research Interview Consent Form

I, _____ understand that my story, photo and voice
(Client Name)

are my own and hereby grant my permission to [Researcher Name] to (check all that apply):

- Interview me
- Take pictures of my image without revealing my identity
- Tape-record my voice
- Videotape me

I understand that the information I provide may be edited and shared both immediately and in the future with audiences on the Hagar and International websites, other public online forums (email, social networking sites, newsletters, etc.) and in promotional materials (newsletters, fact sheets, brochures, PowerPoint presentations, etc.). It may also be shared by select partner organisations of Hagar for the purpose of educating audiences about human rights abuse and Hagar's recovery, empowerment and reintegration programmes.

I consent under the condition that the following requirements are met

- A pseudonym is used to protect my identity.

Other conditions:

-
-

(Client Signature and name, printed)

(Date)

(House Parent/Guardian Signature and name, printed)

(Date)

(Hagar Counselor Witness Signature and name, printed)

(Date)

*Only required for Clients 17 years of age and under

Appendix 8 Media Code of Conduct

Declaration of Commitment

To be signed by all media representatives visiting Hagar.

A copy will be kept on file in the main Hagar office.

I declare that:

- I have read and understand Hagar's Communications Policy
- I have read and understand and will adhere to Hagar's Media Code of Conduct which reflects Hagar's Client Protection Policy.
- I will follow the procedures and protocols as laid out in Hagar's Media Code of Conduct.
- I have not been accused or convicted of any offense involving physical or sexual abuse of children or young people.
- I understand that if a complaint is brought up against me regarding the abuse of a Hagar client while at Hagar, the allegation will be thoroughly investigated in cooperation with the appropriate authorities.

Required Fields:

Name: (please print)

Media outlet address:

Email address:

Nationality:

Passport number:

Signature:

Date:

Hagar witness signature:

Date:

Hagar Media Code of Conduct

The physical, emotional and mental wellbeing of our clients is Hagar's first priority. This code of conduct outlines Hagar's commitment to the protection of our clients from all forms of abuse. All media are expected to uphold the safety, security, privacy and dignity of each woman and child in Hagar's care by strictly abiding by this Code of Conduct at all times.

1. I will not travel to Hagar projects unless accompanied by a Hagar staff representative and will not interview any Hagar client without a Hagar staff representative and counsellor present.
2. I will provide Hagar with interview questions at least 48 hours prior to the interview. I understand that my questions will be translated and shown to the interviewee prior to the interview.
3. I will behave appropriately & in a culturally sensitive way in all interactions with women and children at Hagar. If unsure of boundaries I shall seek guidance from Hagar staff.
4. I will dress in a culturally appropriate way when visiting Hagar projects. Women should not wear revealing clothes; men shall not wear tank tops.
5. I will explain to the interviewee about the audio and visual equipment to be used in the interview. The equipment will be on display at all times.
6. I will demonstrate compassion in my interview technique and in my actions. I will not initiate physical contact with the women and children and will not touch, hug or kiss any women or children at Hagar.
7. I will stop interviewing, filming or taking photos at the Hagar staff member or clients request if they feel the activity is causing distress or is inappropriate.
8. I will not ask overly personal questions.
9. I will not ask the women or children for personal contact details nor will I share my personal contact details with them.
10. I will not give money or gifts to the women or children at Hagar. If I want to leave a gift I will do so via a Hagar staff rep.
11. In keeping with section 2.24 of Hagar's Communications Policy, I will not publish or broadcast any interview, audio or video footage without prior review and authorisation by Hagar according to the guidelines set out in the policy.

Appendix 9 Visitor Code of Conduct

Declaration of Commitment

To be signed by all media representatives visiting Hagar.

A copy will be kept on file in the main Hagar office.

I declare that:

- I have read and understand and will adhere to Hagar's Visitor Code of Conduct which reflects Hagar's Client Protection Policy.
- I will follow the procedures and protocols as laid out in Hagar's Visitor Code of Conduct.
- I understand that if a complaint is brought up against me regarding the abuse of a Hagar client while at Hagar, the allegation will be thoroughly investigated in cooperation with the appropriate authorities.

Required Fields:

Name (please print)

Address:

Email address:

Nationality:

Passport number:

Signature:

Date:

Hagar Visitor Code of Conduct

Introduction

The physical, emotional and mental wellbeing of our clients is Hagar's first priority. This code of conduct outlines Hagar's commitment to the protection of our clients from all forms of abuse. All media are expected to uphold the safety, security, privacy and dignity of each woman and child in Hagar's care by strictly abiding by this Code of Conduct at all times.

1. I will not travel to Hagar projects unless accompanied by an authorised Hagar staff member.
2. I will stay with the Hagar staff member throughout the visit and will not wander off alone anywhere without him/her.
3. I will be appropriately and culturally sensitive in all interactions with Hagar clients. When unsure of boundaries of appropriate/inappropriate behaviour, I shall seek immediate guidance from the Hagar staff member.
4. I will dress modestly and appropriately for the cultural environment. Ladies will not wear revealing clothing and men will not wear shorts or sleeveless shirts.
5. I will demonstrate compassion in my actions and speech. I will not touch, hug or kiss any Hagar client in my interactions with them and is limited to holding hands and light hugs.
6. I will not be alone with any Hagar client on or off a project site nor will I revisit any Hagar project or client without permission and accompanied by an authorised Hagar staff member.
7. I will not ask any Hagar clients for their personal contact (address, phone numbers) nor share my personal contact details with them.
8. I will not disclose the name(s) of any client, address or Hagar location to which I have access, to any other party, without the permission of Hagar.
9. I will not ask personal or probing questions about clients or client backgrounds while at a Hagar project, so as not to bring further stigma and discrimination against a Hagar client.
10. I will not photograph, video, film or collect stories of Hagar clients unless Hagar's prior consent has been given. I understand a no camera policy will be strictly in place during my visit to Hagar projects to avoid any potential abuse.
11. I will not give gifts to any Hagar client unless prior consent has been given by Hagar. I will give any cash donations I wish to give to Hagar's finance team who will distribute to specific projects.

Sources

1. A Way With Words: Guidelines for the Portrayal of People with a Disability. Disability Services, Queensland, Australia. Accessed online August 26, 2010:
http://www.disability.qld.gov.au/community/communication/waywords/documents/way_with_words.pdf. Page 8
2. Australian Press Council Reporting Guidelines; General Press Release #18; 1972. Accessed online August 26, 2010 at:
<http://www.presscouncil.org.au/pcsite/activities/guides/gpr18.html>
3. "Code of Conduct on Images and Messages". Dochas: The Irish Association of Non-Governmental Development Organisations. 2006.
4. Communications about Children. World Vision Partnership Policy on Child Protection.
5. Conventions on the Rights of the Child. United Nations. Available online:
<http://www.2ohchr.org/english/law/cre.htm#part1>
6. Online: http://www.unodc.org/india/womensday08_4th_media.html
7. Guidelines for Reporting and Writing about People With Disabilities. Research and Training Centre for Independent Living (Lifespan Institute). Accessed online August 26, 2010:
<http://www.rtcil.org/products/RTCIL%20publications/Media/Guidelines%20for%20Reporting%20and%20Writing%20about%20People%20with%20Disabilities.pdf>
8. Law on the Suppression of Human Trafficking and Sexual Exploitation, Kingdom of Cambodia, 2008.
9. Media and Communications Policy. Chab Dai Coalition. Draft; September 7, 2010.
10. Principles and Guidelines for Ethical Reporting. UNICEF.
11. Reporting On Children and Young People. UNICEF.
(http://www.unicef.org/eapro/Reporting_on_children_and_young_pp.pdf)
12. WHO Ethical and Safety Recommendation for Interviewing Trafficked Women. World Health Organisation. 2003. Online:
<http://www.who.int/gender/documents/en/final%20recommendations%2023%20oct.pdf>

Appendix 2: Complaints Procedures for Client and Child Protection and Feedback

Complaints Procedures for Client and Child Protection

Commitment to good complaints handling

Receiving feedback and responding to complaints is an important way for Hagar International to demonstrate accountability to its supporters. Hagar International is committed to responding appropriately to feedback and complaints about the organisation's work or practices.

Hagar International's complaints process is fair and transparent and has regard to the principles of natural justice.

Scope of procedure

Hagar International regards a complaint as any expression of dissatisfaction about our organisation, our staff, our volunteers, our partners, our contracted service providers or anyone else acting on our behalf. It includes allegations about client and child sexual exploitation and abuse, harassment, grooming, or any other behaviour/s that contravene Hagar's client and child protection policy.

A complaint may be made by a person to whom we deliver services or who is affected by our services, a partner, a local organisation with which we work, our staff, volunteers, donors, Board members, or a member of the public.

Children and young people under 18 can make a complaint directly to Hagar International without requiring the permission of their parents or guardians. Parents, guardians or other concerned members of the public may make a complaint on behalf of a child or young person but should seek their permission to do so.

Publicising this procedure

Hagar International commits to clearly communicating Hagar's client and child protection policy to all clients, staff, volunteers, visitors, partners, and external stakeholders, including donors, children and young people. This information will be made available in easy to understand language with clear steps outlining our complaint handling process, who to make a complaint to, how complaints will be handled confidentially, and a rigorous investigation commenced immediately.

Staff and volunteers will be made aware of Hagar International's complaints handling process on induction.

How complaints may be made

Complaints or feedback regarding Hagar International staff, volunteers, researchers, monitors, evaluators, Board members, and visitors, can be made directly to any Hagar programme office staff member, Hagar programme office Executive Director, Hagar International Chief Executive Officer, or any other Hagar staff member. The complaint may be provided verbally or in writing. Each

programme office and Hagar International will provide relevant telephone and email contacts in the relevant country to all target communities they are working. Changes in contact details will be made public in a timely manner.

Complaints about the Executive Director, or Chief Executive Officer can be made directly to the Chair of the Board by contacting a Hagar staff member, visitor or volunteer, who will be responsible for contacting the direct report of the individual whom the complaint has been made.

How we will handle minor and complex complaints

Complaints and feedback will be handled in the first instance by Hagar programme office Executive Director, in close communication with the Chief Executive Officer, unless they are the person whom the allegation is being made. As necessary, a complaint may be escalated to the Board of Directors of Hagar International.

Hagar programme offices Executive Director and/or Hagar International's Chief Executive Officer will manage the complaint in a fair way including the choice of those involved in the investigation, the information gathered and the extent of the investigation. Information on the investigation process will be communicated in easy to understand language and with clear timelines.

At any time during the complaint process, Hagar programme office Executive Director and/or Hagar International's Chief Executive Officer may consult with people with particular skill or expertise to provide advice as needed on the complaint being investigated.

The complaints process will permit all parties reasonable opportunity to provide any information they believe will assist the investigation and parties will be given an opportunity to respond to information provided by the other party.

Hagar programme office Executive Director and/or Hagar International Chief Executive Officer will keep the parties informed as to progress of the investigation and any consideration of the matter. Complaints will be responded to in writing with verbal follow up as necessary.

Conflict Resolution

The principles and guidelines to be applied for conflict resolution investigations are as follows:

A person or body called upon to investigate, mediate, adjudicate or exercise discretion shall:

- Act fairly, in good faith, without bias and in a dispassionate manner.
- Give each party the opportunity of adequately stating their case and of correcting or contradicting any relevant statement prejudicial to their case.
- Not receive information except as part of its investigation.
- Presume innocence until guilt is proven.

A person who is involved in handling the complaint is obliged to declare any interest in the matter or any personal connection or relationship with either party.

A person called upon to answer a complaint is entitled to know the particulars of the complaint being made.

Each party has the responsibility to respond to statements made by the other.

Timeframes

Complainants will normally receive a response within ten working days. If the process of responding is expected to take longer, the complainant will be informed of the reason for why it will take longer and an expected timeframe for a response.

Confidentiality

Once the investigation report has been presented to the Hagar programme office Executive Director and/or Hagar International Chief Executive Officer, the discussion of the merits of the matter will be confined to the Executive Director, Chief Executive Officer, and the Board of Directors if necessary, (excluding any person directly involved in the investigation).

The identity of complainants and the content of feedback or complaints will be kept confidential by Hagar programme offices and Hagar International.

However, as stated above, Hagar International may consider that it is necessary to disclose information relating to the complaint to third parties in order to investigate or resolve a complaint effectively. This will be decided on a case-by-case basis, and will be done in discussion with the complainant.

Recording complaint data

A complaints register will be maintained, including date of receipt, summary of complaint, type of complaint and resolution of complaint.

Continuous improvement

A summary of complaints is provided to the Hagar International Board on a yearly basis. The complaints process will be reviewed following each complaint to ensure complaints are adequately responded to and Hagar International's integrity is upheld.