PIN Nepal Case Handling Framework

Table of Content

1		Introduction1					
2		Applicability and Overview of PIN Nepal policies and tools					
3		Rationale1					
4		Commitments					
5		Guiding principles for handling safeguarding concerns/cases in PIN					
6		Responsibility for safeguarding handling framework in PIN: Organogram					
7		Procedures for reporting allegations and incidents					
	7.	1 W	hen should a concern be reported?	. 3			
	7.	2 Re	eporting concerns and complaints externally and internally	. 3			
		7.2.1	Reporting by beneficiaries and community members and external stakeholders	. 3			
		7.2.2	Reporting internally	. 4			
	7.3 Categories of Safeguarding Concerns						
	7.4 Case Handling Framework Flowchart7						
	7.	5 Recor	ding Safeguarding Concerns	. 8			
8		Investi	gation Procedure	. 8			
9		PIN res	ponse to breaches	. 8			
10)	SOP - s	upport to survivors, alleged perpetrators and other parties concerned	. 9			
			ases of GBV/CP or safeguarding violation in which the perpetrator is a community or someone external to the project and where beneficiaries are involved	. 9			
			ases of misconduct of a PIN employee, partner, contractor or volunteer or when PIN e, partner, contractor or volunteer is the victim	. 9			
		10.2.1	Primary considerations	. 9			
		10.2.2	Support for the alleged perpetrator	10			
		10.2.3	Support for the survivor	10			
		10.2.4	After the assault	11			
		10.2.5	Principles of providing support	11			
		Except	ions to the principle of confidentiality	12			
		10.2.6	Child survivor	12			
		10.2.7	HQ support	13			

1 Introduction

This case handling framework (CHF) sets out overall approach and commitment of PIN Nepal to handle any safeguarding concerns¹.

These guidelines provide key minimum steps PIN Nepal will take when responding to serious and sensitive complaints including exploitation, abuse and other unethical behaviour. These guidelines are contextualised according to organisational policies, national jurisdiction, and feasibility in the context of PIN Nepal's operations.

As stipulated in CHS Guidelines for Investigators and PIN Investigation Guidelines, the case handling framework does not do the following:

- Discuss in detail why sexual exploitation, abuse, fraud and corruption are detrimental to the people we seek to assist, the organisation and the humanitarian community at large. A resource that covers these issues well is the <u>AAP/PSEA Task Force video To Serve with Pride</u>. This and other resources can be found on its website www.pseataskforce.org.
- Address every possible scenario that could arise during an actual investigation.
- Substitute for experience, training and adequate supervision.

2 Applicability and Overview of PIN Nepal policies and tools

PIN Nepal case handling framework is relevant for all stakeholders involved in PIN programmes including, but not limited to: PIN staff, volunteers, consultants, contractors, service providers, partners, beneficiaries and community members.

PIN Nepal case handling framework shall be read in conjunction and is interconnected with other PIN key policies, particularly with PIN Code of Conduct, PIN Child Protection Policy, PIN Protection from Sexual Exploitation and Abuse (PSEA) Policy, PIN Safeguarding Policy, PIN Anti-corruption Policy, PIN Conflict of Interest Policy, PIN Whistleblowing Policy, PIN Nepal CRM Policy and PIN Investigation Guidelines. <u>All these policies are accessible here.</u>

PIN Nepal CRM Policy and list of relevant tools and formats referred to herein is annexed to this CHF.

3 Rationale

"Humanitarian agencies have a duty of care to beneficiaries and a responsibility to ensure that beneficiaries are treated with dignity and respect and that certain minimum standards of behaviour are observed."²

"The goal is to create an environment free of sexual exploitation and abuse in humanitarian crises, through integrating the prevention of and response to sexual exploitation and abuse into the protection and assistance function of all humanitarian workers."³

¹ Please note that every case is unique and needs to be handled taking into account specific circumstances. Every case shall be decided on "case by case" basis.

² Core principles of a code of conduct

³ IASC Task Force on Preventing Sexual Exploitation and Abuse. 2002

4 Commitments

PIN is committed to responding effectively, sensitively and swiftly to all allegations and suspicions of abuse. All staff and contractors have a duty to immediately report concerns, suspicions, allegations and incidents that indicate actual or potential abuse and PIN Nepal takes appropriate action in response to any such reports.

PIN Nepal is committed to the following values while addressing breaches of policies:

- 1. Appropriateness and relevance
- 2. Effectiveness and timeliness
- 3. Strengthening local capacities and avoiding negative effects
- 4. Based on communication, participation and feedback
- 5. Complaints welcomed and addressed
- 6. Coordination and complementarity
- 7. Continuous learning and improvement
- 8. Staff supported to do their job effectively, and treated fairly and equitably
- 9. Resources managed and used responsibly for their intended purpose⁴

5 Guiding principles for handling safeguarding concerns/cases in PIN

As stated in PIN key policies, PIN endeavours to act in compliance with highest ethical standards and guiding principles. PIN is a signatory and a member of Core Humanitarian Standards Alliance (hereinafter referred to as "CHS"), Voice, BOND, Alliance 2015, UN Global Compact and partners with a range of donors including DFID, USAID, Europaid, ECHO, UN and others.

PIN approach to handling safeguarding concerns is governed by the following **principles**⁵:

- 1. Confidentiality
- 2. Commitment to safety, security, health and welfare of all parties involved
- 3. Do no harm
- 4. Non-discrimination
- 5. Respect for all parties involved
- 6. Timeliness
- 7. Professionalism
- 8. Best interest of child under the age of 18 years
- 9. Adherence to the law

For principles guiding investigation interviews please refer to PIN Investigation Guidelines as well as CHS Guidelines for Investigations, A guide for humanitarian organisations on receiving and investigating allegations of abuse, exploitation, fraud or corruption by their own staff, Revised November 2015.

⁴ In accordance with CHS Alliance commitments.

⁵ The Secretary General's Bulletin (2003/13) on Special Measures for the Protection from Sexual Exploitation and Sexual Abuse, CHS Guidelines for Investigations and other sources.

For protection and support of survivors and alleged perpetrators, please see chapter 10 of this document.

6 Responsibility for safeguarding handling framework in PIN: Organogram

In Country Programme Organogram, the designated key persons responsible for Safeguarding (Designated Safeguarding Officers) are assigned to oversee and monitor the implementation of the case handling framework on the Country Programme level.

In HQ, there is a Senior Safeguarding Officer at the management level as well as Board level. They are responsible for identifying the risks with regard to safeguarding, keeping logbooks, and representing PIN in safeguarding matters.

Both PIN HQ Organogram as well as PIN Nepal Organogram can be found in ELO and shall be accessible to everyone. They are also annexed to this CHF.

In the information flow (who, how and when) these positions are indicated at every stage of the concern handling process.

7 Procedures for reporting allegations and incidents

7.1 When should a concern be reported?

Any concerns, suspicions, allegations and incidents that indicate actual or potential abuse of children or vulnerable adults should be reported.

7.2 Reporting concerns and complaints externally and internally

7.2.1 Reporting by beneficiaries and community members and external stakeholders

PIN acknowledges that enabling beneficiaries and project stakeholders to seek and receive response for grievances and alleged harm is a critical aspect of accountability. Thus, PIN beneficiaries are encouraged to share their complaints, comments and feedback through the Complaint Response Mechanism (CRM). This formal mechanism, described in the CRM Policy, provides a safe, accessible and effective channel for PIN's beneficiaries and project stakeholders to raise complaints and feedback and for a response or redress to be given.

- Complaints, concerns and suggestions from PIN beneficiaries, community members and external stakeholders must be submitted to the CRM Officer. They can be submitted verbally by phone to the CRM number: for NTC toll free number: 1660 01 00008, for NCell toll free number: 980 15 75 888 between 10:00 AM and 5:00 PM Monday to Friday.
- The CRM numbers and details are outlined on the posters/banners, CRM cards, verbally during orientations, on items distributed during implementation and contact numbers distributed to focal points.
- Contact email: e-mail address will be displayed as above: crmnepal@peopleinneed.cz
- Postal Address: Postal complaints can be sent to the CRM Officer at PIN Nepal's office address: K.M.C 3, 279 Ranibari, Lazimpat, Kathmandu, Nepal.
- Field Officers continuously follow up to ensure that all community members know how to submit complaints.
- Complaints, concerns suggestions and information requests can be submitted in English or Nepali.

- The reception of the concern, complaint or suggestion is officially recorded by CRM Officer in a complaints logbook.
- Depending of the nature of the complaint or suggestion the CRM Officer takes action following the CRM protocol. In case of Safeguarding concern - Misconduct of PIN employee, partner, contractor, volunteer etc. – please see 7.3. Categories of SG concerns below, the CRM Officer (or the person receiving the complaint) shall fill-out SG Case Record Form (Annex 2) and the case will be immediately referred to Designated Safeguarding Officer (DSO).⁶ Also, the CRM officer shall provide the survivor with Informed Consent (Annex 4), Consent Form Referral and Referral Sheet (Annex 3).
- The person submitting a complaint may remain anonymous. Complainants who wish so can leave their contact information for the CRM officer or a relevant program staff so PIN Nepal can get back to them with the results of the process.
- All people who provided their contact information and submitted a suggestion or a complaint should receive a response by phone, letter, email or in person, giving the outcome of their feedback as soon as possible but within 15 working days of receipt. If more time is required to address a complaint, an acknowledgement should be sent by the relevant program staff explaining what further investigation is required to resolve the complaint and the likely timeline. This response will be recorded in the complaint logbook.

If a complainant is not satisfied with the response, he/she may appeal through the CRM mechanism. If they continue to be dissatisfied with the outcome, after all avenues have been explored to resolve the complaint, a letter to the complainant will be sent by the relevant program staff explaining the steps/actions that have been taken, outlining any changes that have been put in place as a result of the feedback and bringing the matter to a close.

PIN Nepal program and monitoring evaluation accountability and learning (MEAL) teams also conduct Focus Group Discussion during monitoring visits to learn and collect the possible complaints of beneficiaries and stakeholders.

7.2.2 Reporting internally

Concerns can be raised by PIN staff, volunteers, interns, consultants, visitors, people working on behalf of PIN and to the relevant extent to PIN RDD's suppliers and partner organizations.

As per PIN Whistleblowing Policy, all PIN staff have the **duty to report using PIN reporting mechanisms** any known or suspected cases of abuse, exploitation, harassment or other forms of unacceptable behaviour, which are in direct breach of the PIN Code of Conduct and the Key PIN Policies.

All complaints or concerns must be reported to the relevant persons using the tools and channels described below.

Reporting safeguarding violations to authorities should be done on a case by case basis with primary consideration being the safety of those involved, Do No Harm principles, best interest of the child, and survivor's rights and wishes.

⁶ This is also described in Art. 4 Par. 2 lett.iii and other relevant parts of CRM policy.

In order to protect the rights of PIN staff and to maintain a safe working environment free of any potential harassment, abuse and exploitation, PIN management has the **duty to investigate** any complaint or concern raised by PIN employees.

PIN staff and contractors may report their concerns via email, telephone, in person to their line manager (one of the line managers he/she trusts) or any member of PIN senior management team.

In case the complaint does not originate from PIN staff (i.e. coming from PIN associate, PIN partner etc.), the PIN staff member receiving the complaint is obliged to act as the complainant and the information must be passed as soon as possible to his/her line manager (one of the line managers he/she trusts).

If the complaint concerns Sexual exploitation and abuse (SEA), any female/male member of senior management team should be consulted, as it would be appropriate considering the complainant sex, even if it is not her/his line manager.

If for any reason it is not possible to report using these routes, reports may be made through the PIN whistleblowing email address <u>report@peopleinneed.cz</u> or <u>psea@peopleinneed.cz</u> (in case the complaint concerns Sexual exploitation and abuse).

Cases involving PIN staff, volunteer, consultant, contractor or a situation where the design or implementation of a project either gives rise to immediate or serious potential child protection concerns need to be dealt with immediately by the Designated Safeguarding Officer, the Country Director (Senior Safeguarding Officer) and escalated to HQ Safeguarding Officer, if:

- Trend of cases not responded to appropriately
- There is a risk of serious or immediate harm to children/communities
- There is a reputational risk

7.3 Categories of Safeguarding Concerns

Any safeguarding concerns should be reported by all staff directly to the Designated Safeguarding Officers according to the timeline below.

Category	Timeframe
Category 1: Any concerns PIN receives (from a community member or internal report) about the misconduct of a PIN employee, partner, contractor or volunteer, with beneficiary, community member, PIN staff or stakeholder staff as a victim	Immediately
Category 2: Any case of GBV/CP or safeguarding violation in which the perpetrator is a community member or someone external to the project and where beneficiaries are involved.	24 hours
Category 3: Concerns that a project may have negative consequences which may include an increase in violence either for community members or beneficiaries specifically	Immediately

Specific projects may have separate timelines and reporting procedures for DSO to follow. For example, LNGB project requires that any concerns around Fund Manager's staff conduct have to be reported to the Fund Manager immediately through GEC whistleblowing email to gecpmo@uk.pwc.com and to Portfolio Manager. These concerns will be investigated by the Fund Manager.

Concerns in LGNB project of misconduct of a PIN employee, partner, contractor or volunteer, with beneficiary or community member a victim need to be reported to the Fund Manager (FM) in 24 hours. Likewise, category case 3 (any concerns that a project may have possible negative impacts on the community or beneficiaries) needs to be immediately reported to the DSO who then reports to the Fund Manager immediately. When ready, the DSO reports a full case report:

- What has happened?
- What actions did you take and what were the findings of any investigations?
- What support has the child / survivor received?
- What lessons have you learned? How will you prevent it from happening again?

Category 2 cases do not need to be reported to the FM unless we have specific concerns. The FM expects that you will respond to these and support the survivors in accordance to the PIN internal procedures.

Adequate instructions for reporting of SG concerns shall be given to PIN partners – LNGB Partner Safeguarding reporting flowchart (Annex 9).

7.4 Case Handling Framework Flowchart

All concerns will be handled by the DSO according to the flowchart below.





7.5 Recording Safeguarding Concerns

All cases are recorded in PIN internal system to enable us to track and investigate confidentially and sensitively.

Currently, PIN Incident Reporting Tool is undergoing revision to include sexual exploitation and abuse (SEA), fraud and other types of concerns. Until the finalization of the tool, the information is uploaded to a protected ELO folder accessible only to trained and authorized staff, such as the Designated Safeguarding Officers. The data is collected at both Country Programme and feeds in the central level. This system enables us to track and investigate confidentially and sensitively every allegation.

Record keeping

• All records and reports are recorded on CP level and uploaded into the protected folder, they are then anonymized, compiled and analysed on HQ level. Physical files are kept in locked cabinet.

For further information, please see <u>PIN Investigation Guidelines</u> (including different templates for record keeping).

8 Investigation Procedure

Investigations will be carried out when appropriate in cases of category 1 (any concerns PIN receives (from a community member or internal report) about the misconduct of a PIN employee, partner, contractor or volunteer). For the category case 3 (concerns that a project may have negative consequences which may include an increase in violence either for community members or beneficiaries specifically)the group consisting of DSOs, members of MEAL team and concerned programs will be formed and will lead the process and provide strategies and mitigation measures to the probable negative adverse effect on the community or beneficiaries. The decision regarding the investigation will be made according to the framework in section 7.4.

The investigations will be guided by <u>PIN Investigation Guidelines</u> and <u>PIN Whistleblowing Policy</u>, which are to be read in conjunction with this document. The 3 members investigation committee will be formed and the investigations will be conducted by trained staff-Lead Investigation Officer together with appointed Co-Investigator (for interviews and evidence gathering). The committee will be composed of CD, Head of HR, Head of Programmes or other senior staff available to enable swift investigation and transparent decision-making. In most severe cases⁷, HQ lawyer, HQ Safeguarding Officer and other senior staff shall be involved with respecting the confidentiality and other principles of investigation. The Lead Investigation Officer and the Co-investigator follow the PIN Investigation Guidelines while handling the case, including special provisions when investigation procedure involves children.

9 PIN response to breaches

In cases of proven substantial breaches of the *PIN Code of Conduct* and *Key PIN Policies*, PIN (Line Manager in consultation with HR and legal advisor) will take immediate and appropriate action and will support the needs of those affected. This might include:

⁷ HQ shall be informed about Category 1 cases and intervene in case the Senior DSO – CD asks for HQ intervention or CD or other senior management staff is the Subject of Complaint.

PIN full or part-time staff	disciplinary action up to dismissal
PIN volunteers and interns	action up to termination of contract
PIN consultants	termination of contract
Visitors to PIN	action up to suspension of support for the visit
PIN associates	termination of contract
PIN partner organisation	action up to withdrawal of funding or support and/or termination of partnership agreement

Depending on the nature and the circumstances of the case, PIN shall involve appropriate authorities to ensure the protection of PIN staff, associates and/or beneficiaries.

10 SOP - support to survivors, alleged perpetrators and other parties concerned

10.1 Cases of GBV/CP or safeguarding violation in which the perpetrator is a community member or someone external to the project and where beneficiaries are involved

For cases from category 2 (cases of GBV/CP or safeguarding violation in which the perpetrator is a community member or someone external to the project and where beneficiaries are involved) PIN will primarily consider whether and how involvement might violate the Do No Harm principle. All the support will be guided by survivor centred approach and best interest of the child principles.

Such cases will be recorded and the survivor will be informed by DSO or staff designated by the DSO of available services: medical, psycho social, legal support, safe homes, etc. specified in service mapping file and referral sheets. The DSO or staff designated by them will establish whether the survivor wishes to access these services but needs help accessing them. In such instance, when possible, the DSO or staff designated by the DSO will assist the survivor in accessing services. If such assistance was provided, DSO or staff designated by the DSO will follow up with the survivor in maximum 2 weeks to ensure the service provision was successful.

10.2 Cases of misconduct of a PIN employee, partner, contractor or volunteer or when PIN employee, partner, contractor or volunteer is the victim

10.2.1 Primary considerations

In cases from category 1 (misconduct of a PIN employee, partner, contractor or volunteer), and the Designated Safeguarding Officer will immediately assess the safety of survivors and witnesses, with all means possible. The assessment will answer the following questions:

- Does DSO's involvement present a risk to Do No Harm principle?
- Is the survivor/witness still at risk?
- Who is responsible for their welfare?
- Does survivor/witness know how to report concerns of harassment/intimidation?
- What family/friends/professional support networks are available?

When needed, this assessment will also be conducted for cases from category 3 (concerns that a project may have negative consequences which may include an increase in violence either for community members or beneficiaries specifically).

10.2.2 Support for the alleged perpetrator

Being accused of sexual assault or other forms of violence can be traumatic and stressful for the alleged perpetrator. Designated staff dealing with the allegation/case (DSO, investigation committee) must adhere to the principles of respect, non-discrimination, confidentiality and presumption of innocence at all stages of the case handling and investigation. The alleged perpetrator should be treated with dignity and sensitivity.

Designated staff dealing with the allegation/case recognize that false or malicious accusations can also be made.

Support services such as psychosocial support shall be provided based on case by case basis.

During investigation and interviews, the Investigation Officers (LIO and Co-investigator) as well as Investigation Committee (if interacts with the alleged perpetrator) must treat the alleged perpetrator with due respect and provide him/her with all necessary cooperation and assistance (including translation services).

If appropriate, the alleged perpetrator will be suspended until the end of investigation. Head of HR shall make that decision after deliberation with Designated Safeguarding Officers and Country Director.

If a PIN employee, partner, contractor or volunteer is accused of serious misconduct, DSO, Head of HR and Country Director will decide whether to suspend the person or otherwise ensure they have no contact with the survivor, witnesses or other potential victims until the investigation is completed. Judgment call is essential to assess the situation with respect to rights of all persons involved, most importantly the survivor. The Head of HR, DSO, and Country Director shall approach legal advisors and a psychologist when and of appropriate.

10.2.3 Support for the survivor

DSO and Country Director will assign one staff member, preferably of the same gender as survivor (it can be the DSO), who will be responsible for communicating with and assisting the survivor. This staff will be trained and sensitized in regards to survivor centred approach, Do No Harm, and best interest of the child principles. The staff designated to assist the survivor will provide information on services available and check whether the survivor has a person of trust who he / she wishes to accompany him / her. Should the survivor need assistance in accessing services, the assigned staff member will accompany him / her and assist.

The cases will be treated as critical and handled with confidentiality and sensitivity. Primary consideration will be given to the varied and unique psycho social, mental, and physical needs of survivors, and age and gender appropriate support.

For each working Rural Municipality and on central level, PIN Nepal maps various service providers and develops a referral sheet that contains relevant information: names, contact information, and services

provided by them. These include state providers, such as police and health care providers, as well as non state agencies: NGOs that provide varied assistance to the survivors: legal assistance, psychosocial counselling, shelter, sexual and reproductive health assistance. Staff have these referral sheets with them while traveling to the field so that they can refer anyone to existing service providers.

The staff designated to assist the survivor presents available options to the survivor that may include Municipality level service providers, or central level verified service providers referred from the service mapping.

10.2.4 After the assault

In category 1 cases under 7.3. above: As soon as possible, staff designated to assist the survivor should get them to a place where they feel safe. It is important that the victim participates as much as possible in the decision making process. The safety of the survivor should be ensured at all times and considered the main priority. Staff designated to assist the survivor need to assess safety risks and minimize the risks for survivors and their immediate family members, while remaining calm, avoiding questioning the accuracy of survivor's story and victim blaming. The staff designated to assist the survivor should:

- Introduce himself / herself, present the services that are available from the referral sheet, and be transparent in actions PIN will take.
- Explain clearly to the survivor his / her role and what he / she can and can not offer.
- Explain the principle of confidentiality.
- Explain survivor's right to withdraw at any time from the process, refuse any type of assistance, and right to pursue legal action.
- Arrange for a medical examination and necessary treatment recommended by the doctor if the survivor asks for it. The Designated Safeguarding Officer should know where to get PEP kit treatment in country.
- Help the survivor to identify people who can support and comfort him / her, and whom he / she trusts.
- Be attentive to their needs and address them when and if possible.
- If needed, relocate him / her, accompanied by a family member, a colleague, or a friend.

In category 2 cases, if possible, the DSO or designated staff (CRM officer or whoever is in contact with the person) will provide referral support – Consent Form Referral and Referral Sheet (Annex 3), with respecting principles of confidentiality, Do No Harm, best interest of a child and other principles.

10.2.5 Principles of providing support

When appropriate, the staff designated to assist the survivor should explain that their actions to assist the survivor will be guided by the following principles:

- **Confidentiality**. Maintaining confidentiality means that information about the survivor (their name, details of the case or any other identifying details) will not be shared with others at work or outside of work, without the informed consent of the survivor. This means not sharing information with co-workers, doctors, other NGOS, family members, the media, etc. If a colleague or others have heard or witnessed what has happened they must keep the information confidential. There are certain exceptions to this rule, see below.
- **Informed consent**. Informed consent means that the survivor is informed which information will be shared, with whom it will be shared, what it will be used for and that they have the right to not give consent without any consequences.

- **Respect** means treating the survivor as the primary actor in the situation. The wishes, rights, and dignity of the survivor must always be the priority. The staff designated to assist the survivor can respectfully facilitate the decision making process (decisions regarding reporting assault to the authorities, medical check-up, accessing other services) but not pressure the survivor. Staff designated to assist the survivor must recognize that some survivors of domestic violence decide to stay in the abusive relationship. In these situations, also no action can be taken against the will of the person affected by domestic violence.
- Non-discrimination. All people have the right to the best possible assistance without discrimination on the basis of gender, age, disability, race, colour, language, religion or political beliefs, sexual orientation, status or social class, or any other.

Exceptions to the principle of confidentiality

- When a survivor might try to hurt herself or himself
- When there is a risk that the survivor might hurt others
- When a child is in danger
- When national or international laws or policies require mandatory reporting (for example because of sexual exploitation and abuse by humanitarian workers) this will be assessed with primary concern of survivor's consent and Do No Harm principle.

The DSOs will decide on case-by-case basis in a timely manner whether any of the exceptions above apply. The survivor must be informed of the reason for mandatory reporting.

10.2.6 Child survivor

In category 1 cases, where a survivor is a child, these guidance shall apply in compliance with PIN <u>Child Protection Policy</u> and <u>PIN Investigation Guidelines</u>:

- The safety and wellbeing of the child, children or vulnerable adult(s) is the object of primary consideration and immediate steps must be taken as necessary to protect them and to address any possible urgent medical needs.
- Where it appears that a breach of the national criminal code may have taken place, the matter will be referred to the appropriate national authorities in line with local reporting/referral systems if reporting is in line with the best interest of the child survivor.
- A virtual or in person case discussion involving relevant members of the Senior Management Team, the DSO, CD and other colleagues if appropriate will be held within 24 hours to discuss the nature of the case and to take decisions on next steps.
- Concerns relating to issues in a partner organization or contractors will be referred to the concerned authority within their organization for the investigation. The Country Director is responsible for keeping up to date records of such issues.
- The best interest of a child shall be always pursued (taking into consideration local laws). Caregiver / parents may have to be involved for any referral taking into account the best interest and protection of the child.
- When needed, PIN shall engage psychosocial support and staff trained in child protection.
- For further details please see <u>PIN Child Protection Policy</u> and <u>PIN Investigation Guidelines</u>.

10.2.7 HQ support

For further guidance for investigations, please consult <u>CHS Guidelines for Investigators (CHS IG)</u> – all PIN Safeguarding and Investigation documents to be found in ELO in 16 folder. In cases involving PIN staff, partners, or contractors, a protection and risk analysis is conducted in every case (including the decision whether to suspend either the alleged perpetrator or the survivor). When there is an allegation regarding sexual exploitation and abuse (SEA) made with a female survivor, there is a female committee appointed and a trained female Investigator (Investigation guidelines in conjunction with CHS materials). Please see p. 8 of the CHS Investigation Guidelines (attachment 5), where the basic principle is enshrined– to follow up all allegations and concerns revealed from CRM (including focus groups discussions) and to maintain the confidentiality (p. 20 of CHS IG).

Page 33 of CHS IG clearly stipulates how the staff trained in investigations interview vulnerable witnesses (the narrow definition of vulnerable witnesses: children, youth and people with disabilities or serious illnesses).

PIN does not have a specific Victim (survivor) assistance policy, but we use the <u>CHS reference to the</u> <u>UN General Assembly resolution 62/214 (Annex J to the CHS IG</u>) and the IASC Core Standards on PSEA (p. 54 of CHS IG), where the basic principles are outlined.

<u>The Support and Assistance from PIN (HQ), when PIN staff is a survivor</u> – depending on individual needs of the survivor directly arising from sexual exploitation and abuse - comprises of emergency assistance (medical care, psychological care); legal services (PIN legal department or local consultant) and material care, as necessary. The duration of provision of this support and assistance is also set in accordance with individual needs of the Survivor.

Emergency 24 hour assistance (including psychological services) – if not by HQ, where PIN has an internal senior HR person certified in provision of crisis intervention support, then by our external companies: Conflict Management International Czech Republic (http://www.conflict-management.org/); Mind Art (https://www.mindart.cz/) and several individual external consultants, plus the medical consultations are provided by the Life Support company (https://lifesupport.cz/en/).

Our psychologist, mediator and investigation advisor, senior expert, Ms Dana Patočková, is providing us advice and trainings on how to conduct interviews and investigations regarding these very sensitive matters. Ms. Dana Patočková, Director of Conflict Management International Czech Republic is one the most experienced Czech mediators with many years of experience with international cases.