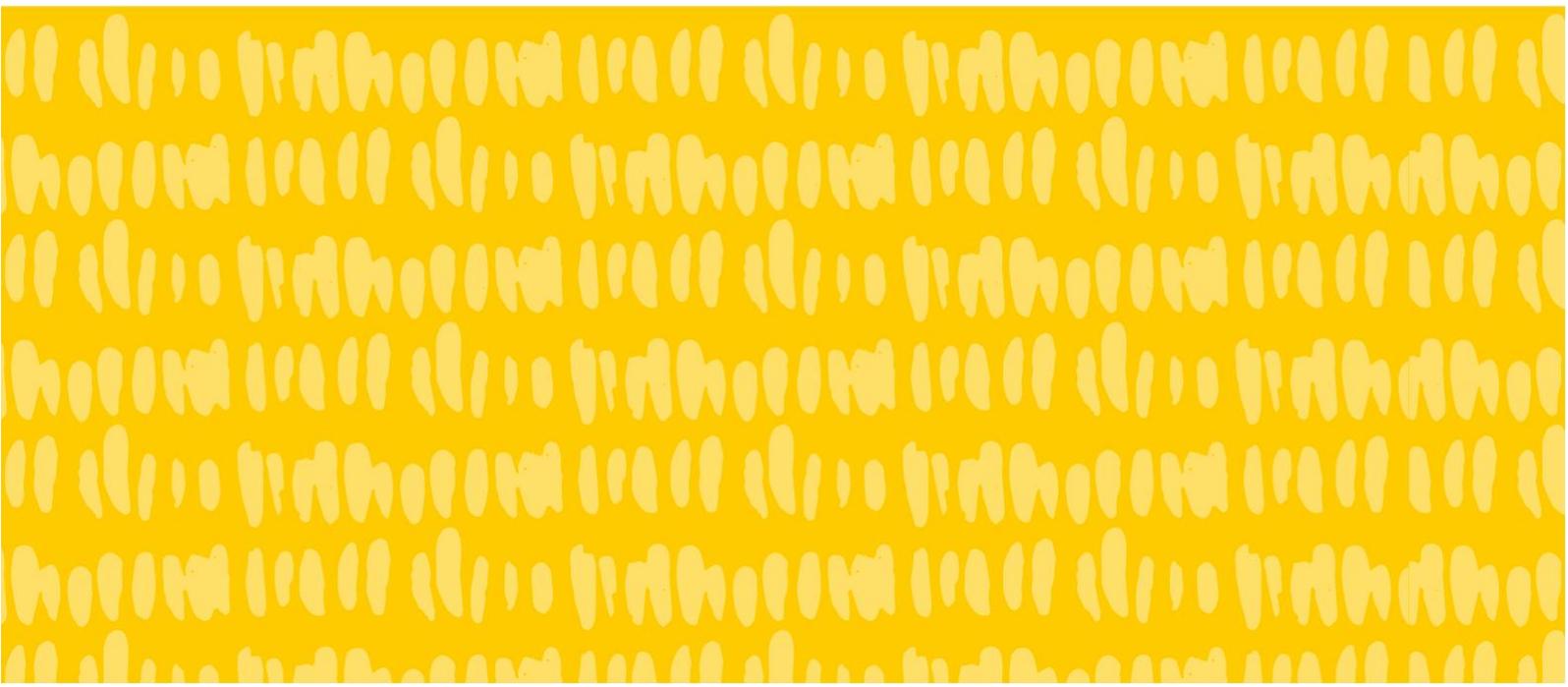




# Safeguarding and Protection Policy



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# Foreword

At Projet Jeune Leader, we understand that we have a fundamental duty of care to protect the children, youth, and adults engaged in our programs and activities. We therefore undertake to ensuring their security and protection against all forms of abuse and exploitation.

**We have zero tolerance for any kind of abuse in any circumstances, whether perpetrated by our staff, volunteers, consultants, educators, or by other partners.** Anyone working for or with Projet Jeune Leader must adhere to the principles and conduct set out in this Policy.

By acting together, in a common front, we are committed to establishing an institutional culture that does not tolerate abuse or misconduct prejudicial to human dignity.

Maia Ramarosandratana, Executive Director

# PART 1 : Introduction

## Article 1 : Preamble

Projet Jeune Leader (PJL) is a non-profit, non-governmental organization providing transformative comprehensive sexuality education to young adolescents in Madagascar.

As an organization working so that “*every adolescent in Madagascar thrives,*” we make their interests our priority. Supporting and protecting children will always be priority areas for our organization. **We therefore have a zero tolerance stance towards any form of abuse, harassment and exploitation aimed at the children, our teams, and anyone in a vulnerable position.**

We acknowledge the many harmful consequences of abuse on human beings as the primary obstacle to their fulfillment, development, physical, psychological and emotional health, dignity and well-being. We also recognize that certain groups of people, such as those with disabilities or survivors of gender-based violence, are particularly vulnerable to abuse.

## Article 2 : Policy Statement

Projet Jeune Leader has developed this Safeguarding and Protection Policy to provide the safest and most secure environment possible for:

- Children who study in our partner schools,
- Vulnerable adults who take part in our programs,
- Other children in contact with our program in one way or another,
- Staff (personnel, volunteers, consultants, educators, implementing partners, board members) who carry out and/or contribute to our activities.

This Policy highlights actions to prevent – and, otherwise, address – intentional and unintentional abuse, as well as any kind of harm (intimidation, harassment, exploitation) that might occur to the people mentioned above.

This commitment applies regardless of age, disability, gender, race, ethnicity, faith or beliefs, sexual orientation, socioeconomic background, professional status, and any other characteristics of the people with whom we are in contact pursuant to our program, or coming into contact with our program.

Our Policy highlights the obligation of our staff to maintain high standards of behavior when interacting with children and young people. However, it goes further than that. It also requires our staff to be on the lookout for cases of child abuse that may occur from other individuals in the schools and communities where we operate. So we raise awareness and encourage our employees to take reasonable steps to report any violations they observe, either from inside or outside the organization.

## Article 3 : Context of this Policy for Projet Jeune Leader

As part of our programs, our teams (which include staff, educators, consultants, subcontractors, etc.) regularly interact with children, adolescents and vulnerable adults. Projet Jeune Leader realizes that the aforementioned teams are in a position of responsibility, power and influence with respect to our program participants. In order to protect these participants from any potential risk of abuse, it is therefore essential to regulate their interactions with our teams appropriately.

#### **Article 4 : Policy Goals and Targets**

This Policy aims to:

- Minimize the likelihood of mistreatment of all those who *benefit from or come into contact with* our programs, be they children, young people, or vulnerable adults;
- Ensure that all those involved in our programs are protected from all forms of abuse;
- Support Projet Jeune Leader employees and representatives against false or malicious allegations of misconduct;
- Provide clear guidelines to our staff and partners on acceptable and unacceptable protection and safeguarding behavior and practice;
- Establish a framework conducive to expressing concerns regarding security, protection, safeguarding and well-being;
- Describe in a transparent manner the steps to follow in reporting any concerns related to security, protection and safeguarding, as well as our commitment to respond to them in a fair and just manner, while respecting everyone’s rights.

Furthermore, this Policy aims to ensure the protection of all members connected with Projet Jeune Leader, regardless of their role or how long they have been associated with it. However, we identify two priority groups requiring particular attention in order to guarantee their protection and well-being: children and vulnerable adults.

“**Child**” – Any person under eighteen (18) years of age.

“**Vulnerable adult**”- Any person aged eighteen (18) years or over, who may be exposed to exploitation due to physical or mental disability, economic dependence, limited literacy skills, geographic isolation, or other social or economic constraints that prevent them from caring for themselves or protecting themselves from major forms of harm or exploitation.

We also acknowledge that employees (staff, consultants, etc.) in supervisory positions of power and authority may exercise a form of power over each other that exposes them to the risk of abusive behavior and harassment.

#### **Article 5 : Guiding principles**

This Policy is based on the following guiding principles:

- Zero tolerance of mistreatment and abuse;
- Recognizing and promoting the best interests of children and young people, including their developing abilities, as provided for in the United Nations Convention on the Rights of the Child;
- Sharing responsibility to protect children and adults from abuse;
- Using a risk management approach to prevent child and youth abuse;
- Reporting and responding to all incidents of child and youth abuse;
- Handling any concerns related to poor practices, actual abuse or breaches of this Policy in complete confidentiality. This is to protect children and vulnerable adults from further harm.

#### **Article 6 : Policy Scope**

This Policy applies to all of Projet Jeune Leader. So those mainly affected by its provisions are the members of our board of directors, our staff (whether paid or voluntary, including consultants), the Jeune Leader and Mpanabe Jeune Leader educators, and any other person acting in the name or on behalf of Projet Jeune Leader.

However, we also expect other people who interact with Projet Jeune Leader (visitors, financial partners, technical partners, donors, public middle school principals, members of any other agencies or partner organizations) to understand our safeguarding and protection commitment and be aware of this Policy. This is to encourage external partners to take safeguarding and protection issues seriously and also defend and respect the rights of children and young people pursuant to their respective activities.

All the people mentioned above may be in direct or indirect contact with one or more children or vulnerable adults while working with Projet Jeune Leader.

- **Direct contact** involves the physical presence of one or more children, whether occasional or regular, short or long term. This includes visiting schools, working in schools, attending meetings, workshops or conferences where children and young people are present, as well as corresponding with and contacting children and young people online (Non-exhaustive list).
- **Indirect contact** involves accessing information about children pursuant to working with Projet Jeune Leader, such as children’s names, addresses, photographs and case studies (Non-exhaustive list).

### **Article 7 : Legal context**

This Policy has been developed to comply with international standards such as the Universal Declaration of Human Rights and the United Nations Convention on the Rights of the Child. According to that Convention: *“The child, because of its lack of physical and intellectual maturity, needs special protection and care, in particular appropriate legal protection, before and after birth.”*

This Policy also operates in line with local common and statutory law in Madagascar. We are also committed to complying with all applicable laws in the country.

### **Article 8 : Definitions**

The following terms are used several times in this document and are to be understood as follows:

**“Safeguarding”**. Includes the internal policies, procedures and practice of our organization (Projet Jeune Leader) designed to prevent any harm or any form of exploitation, abuse and harassment of children and vulnerable adults **caused by Projet Jeune Leader’s implemented programs, operations, staff and associates**. This is to protect them and react correctly when harm is done.

**“Protection”**. Refers to actions or initiatives undertaken by our organization (Projet Jeune Leader) in its external environment to ensure that the community or environment in which it operates protects children and vulnerable adults from all forms of harm, including abuse, neglect or exploitation.

**“Abuse”**. Any mistreatment of people, encompassing all direct or indirect actions or omissions committed by individuals or institutions, that cause harm to children and vulnerable adults or diminish their chances of enjoying a safe environment and healthy development. Abuse may take various forms:

**“Physical abuse”**. This may include any direct act of physical injury to a child or young person that is not accidental. Physical abuse may take the form of slapping, punching, shaking, kicking, burning, shoving or grabbing. The injury may appear as bruises, cuts, burns or fractures. Physical abuse also includes giving tasks that would clearly be beyond the child's ability to handle safely.

**“Emotional abuse.”** This is persistent psychological abuse that has a severe impact on a child's behavior and development. It involves withholding normal respect and may take the form of persistent personal criticism, humiliation or discrimination. This may occur in situations where the child is permanently excluded from activities, or the distribution of gifts (...) in connection or

otherwise with its status, gender, religion, ethnic origin and/or due to other people's unrealistic expectations.

**“Sexual abuse”**. This covers all forms of sexual acts perpetrated on a child by another person and includes sexual abuse and sexual harassment. This occurs when an older or bigger child or adult uses a child for their own sexual stimulation or gratification. These include acts with and without penetration as well as threats and exposure to all forms of pornographic content and sexual acts.

**“Exploitation”** is considered to have occurred if an adult has perpetrated an act of abuse of power, services, age or authority, or the use of physical force or emotional manipulation.

**“Neglect”**. This involves any failure to prevent a child's exposure to danger, or the extreme failure to meet essential aspects of their physical and emotional needs such as access to drinking water, food, shelter, sanitation, supervision and medical care. This results in significant impairment of the child's health or development. This situation may occur when the adult does not adequately supervise children's safety or exposes them to extreme conditions and/or avoidable risks.

#### **Harmful socio-professional behaviors:**

**“Harassment”**. A form of abusive behavior that is shown in repeated actions aimed at degrading, humiliating or intimidating a person in the workplace, thereby affecting their mental and emotional well-being.

**“Sexual harassment”**. Any unwanted behavior or speech with a sexual connotation that creates a hostile, intimidating or offensive workplace environment for the victim. This may include unsolicited sexual advances, suggestive remarks, inappropriate jokes or indecent gestures.

**“Abuse of authority”**. Abusive behavior in which a person in a position of authority uses their power unfairly or inappropriately to control, manipulate, or dominate others, creating a toxic and oppressive work environment.

**“Discrimination”**. Any unjust or unfair treatment of a person or group of people based on characteristics such as race, gender, age, sexual orientation, religion, ethnic origin, disability or other personal characteristics. This may be shown in actions such as refusing employment, unfair promotions, demotion or different treatment in working conditions.

# PART 2 : Preventive Strategies

## Article 9 : Assessing and mitigating overall safeguarding and protection risks

- Projet Jeune Leader acknowledges the external risks related to the socio-economic and geographical context of our intervention areas. We are aware of the prevailing culture in such areas, characterized by tolerance towards forms of abuse and the precarious conditions in which adolescents live and grow up, exposing them on a daily basis to various forms of exploitation. We are also aware of the low rate of reporting and assistance to victims of abuse, as well as the gaps in the justice and support system. Moreover, we realize that the barriers to accessing information in such areas, such as illiteracy, lack of internet connection or even mobile phones, hamper the spread and reception of essential information.
  
- Projet Jeune Leader acknowledges that there are also potential risks that we expose adolescents to during our day-to-day activities: especially life skills education sessions/comprehensive sexuality education<sup>1</sup>, individual counseling sessions, and workshops for students' parents. This is especially true as we address subjects that are still taboo for many Malagasy households.
  
- Projet Jeune Leader also acknowledges that there are potential risks that we expose adolescents and vulnerable adults to when implementing new activities. To identify and manage such new risks, our Safeguarding and Protection Committee – supported by Projet Jeune Leader Management– must carry out a “risk assessment” (see below) when designing new program activities.
  
- Projet Jeune Leader acknowledges the complex challenges faced by our educators (Jeune Leader and Mpanabe Jeune Leader), as well as the difficult working conditions in which they operate. These are likely to affect their mental health and therefore impact their work with adolescents. To remedy this, we provide specific training on the different signs of emotional distress and the symptoms to watch out for, so that participants are able to anticipate such situations and report them effectively to the Safeguarding and Protection Focal Point.

The process below is used to assess and mitigate safeguarding and protection risks generally:

1) Keep an updated **risk register**.

The Safeguarding and Protection Committee keeps a risk register, which makes us aware of risks and able to actively minimize opportunities and situations where stakeholders might be harmed.

2) Regularly update this risk register.

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<sup>1</sup> Projet Jeune Leader (PJL) is a non-profit NGO based in Madagascar that has launched an innovative, high-quality model aimed at providing the country's young adolescents with life-changing comprehensive sexuality education for the first time.

The Safeguarding and Protection Committee updates this risk register at least at each quarterly meeting, during which the following various issues are addressed:

- Do these risks still exist?
- Have they been reduced, controlled and managed by existing strategies?
- Have new risks emerged?
- What strategies should we implement to reduce, eliminate and control these emerging risks?

During those meetings, the Committee also analyzes future new activities according to the degree of risk associated with the activity by asking itself the following questions, among others:

What are the practical aspects of the activity to consider? What are the most worrying scenarios that might materialize? What risks are involved and what are the causes? How likely are such risks to materialize? What would be the consequences and what forms of harm or damage might result? What control measures, such as this Policy, its procedures and strategies, are already in place to mitigate such risks?

3) Develop strategies to minimize risk and subsequently reduce the likelihood of harm or abuse.

At this stage, it is assumed that the procedures set out in this Policy have been followed. Safeguarding and Protection Committee discussions at this level will focus on required complementary strategies, such as additional training sessions for those involved in the activity, enhanced activity monitoring by the Focal Point, adjusting or even canceling the activity if the risks are considered too high.

#### **Article 10: Assessment and mitigating safeguarding and protection risks for research and evaluation activities**

It is obvious that research and evaluation activities have specific risks; so the following measures need to be applied to identify and mitigate such risks.

- 1) At the start of each new evaluation or research project, evaluation staff and/or lead researchers must identify and document risks related to research and evaluation activities in a document provided for this purpose. The minimum risks to consider are:
  - Re-traumatizing participants through the interviews and the questions asked; we realize that sharing experiences with researchers may rekindle past trauma in participants.
  - Retaliation, or the risk of exposing and stigmatizing participants if it is known that they took part in a research activity. This can have negative consequences on their personal and professional lives.
  - The research team being unable to adequately support the information revealed by participants, which may leave the latter even more vulnerable.
  - Increased participant distress due to a lack of clearly defined referral pathways, leaving unmet needs for psychosocial and other types of support.
  - Participants exploited by researchers who may abuse their position of power to obtain information or other favors.

The preventive measures put in place by the evaluation staff and/or lead researchers, as well as the strategies to mitigate and respond to such risks will be included in the same document. Those responsible ensure that such strategies comply with Projet Jeune Leader's Safeguarding and Protection Policy. Generally speaking, such strategies include the following :

- Providing additional training for all researchers and Projet Jeune Leader teams responsible for the research/evaluation activity that will be adapted to the data collection activity in question and the needs of the community concerned. Such training will cover, among other things:
  - o All relevant procedures and processes, including those related to detecting, reporting, and responding to concerns; the code of conduct and principles of informed consent;
  - o Practicing key research skills via role-play and pilot tool testing. These skills include maintaining confidentiality, establishing a trusting, respectful relationship, active and non-judgmental listening, techniques for identifying, managing and directing cases of distress; warning signs of trauma and psychological first aid, techniques to avoid retraumatizing trauma survivors.
- Designing procedures and informed consent forms adapted to the research/evaluation activity and the participants.
- Giving research/ evaluation participants clear feedback and reporting channels, so they can share their comments on the evaluation or research activity.
- Clarifying the data collection methodology to use and the reasons justifying the choice of methodology.
- Justifying the expected data collection methodology.
- Identifying local reporting laws and procedures, as well as the process and likely outcomes of using these services. Next, mapping support services and referral locations available in areas where evaluation and research activities will take place; the aim being to facilitate participants' referral to services close to their local community.
- Developing from the outset a procedure for handling cases requiring mandatory reporting (criminal allegations, allegations involving children, vulnerable people or people at risk of abuse or harm).

When designing data collection tools, the team responsible must be sure :

- Not to use terms that might be confusing, stigmatizing or annoying to the participant.
- Not to use stories or examples with harmful gender norms or that stigmatize participants.
- Not to ask for personal information that might identify individuals or put them in harm's way.
- Test the instruments beforehand to ensure that they make sense to participants, are worded sensitively and not a source of distress.

2) **Communicate** this document presenting the risks and risk mitigation strategies associated with the research/evaluation activity **to the Safeguarding and Protection Focal Point** for possible comments before any implementation.

### **Article 11 : Prevention via a Code of Conduct applicable to all individuals**

This Code of Conduct drawn up by Projet Jeune Leader applies to the members of our board of directors, our staff (whether paid or volunteer, and consultants), the Jeune Leader and Mpanabe Jeune Leader educators, and any other person acting in the name or on behalf of Projet Jeune Leader. This Code governs interactions between the aforesaid groups, as well as the interactions of such groups with/towards children, young people and vulnerable adults.

#### **Code of Conduct**

Projet Jeune Leader (PJL) is working to give every adolescent in Madagascar essential knowledge, skills, and support through transformative comprehensive sexuality education. Projet Jeune Leader provides a holistic approach covering the various life skills needed to enhance the education by guaranteeing individualized support and an environment promoting respect, development and empowerment for everyone.

This Code of Conduct, which is a key part of our organization's Safeguarding and Protection Policy, contains the essential points established by Projet Jeune Leader to promote and defend the highest standards of ethical and professional conduct among all those acting in the name or on behalf of Projet Jeune Leader.

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Despite the culture I have grown up in, the upbringing I have received and the values instilled in me, I, \_\_\_\_\_ the undersigned, agree that while working with Projet Jeune Leader and in all my interactions with children, vulnerable adults, employees or any other person in connection with Projet Jeune Leader:

I will adopt the following attitudes and behaviors:

I am aware that the people I interact with have different social, economic, cultural realities and abilities. I respect the fundamental rights of all people, regardless of gender, age, disability, health, language, ethnicity, race, color, religion, sexual orientation and any other aspect of identity or personal characteristics.

I use benevolent, empathetic, non-violent, non-provoking behavior (actions, language, gestures, clothing) in all my interactions. I show fairness and integrity, act with tact, and treat all children, young people, employees and associates with sensitivity, tolerance, dignity and respect.

I report immediately (or as soon as I feel comfortable enough to do so) any concerns regarding potential or actual abuse or mistreatment of a child, any known breaches of this Code of Conduct and this Safeguarding and Protection Policy, and any other concerns regarding the security of those with whom I come into contact pursuant to working with Projet Jeune Leader. This will be done as quickly as possible in accordance with the Projet Jeune Leader reporting system: **call, text or send a WhatsApp message to the 0384568710 number, or notify anyone connected with Projet Jeune Leader that you feel comfortable enough to report to.** I will do so with the assurance that I will be protected and supported by Projet Jeune Leader.

I understand Projet Jeune Leader regulations governing the use of photography, videos and social media. I ensure that information or images about children are never used in a way that puts them at risk or compromises their safety or dignity.

I inform the Safeguarding and Protection Committee if I am involved in a situation likely to harm the reputation of Projet Jeune Leader or against its values, or if I am the subject of a investigation for an offense or criminal act, however minor it may be.

I take care that my interactions with children are visible to everyone, minimizing as far as possible the times when I am alone with children away from other people. I will prioritize alone time with children only when the nature of my role warrants it (e.g. during counseling sessions), but always able to be seen by other people. If a child is in immediate danger, I make sure that an adult is nearby if possible.

I inform the Safeguarding and Protection Committee if my emotional state risks harming proper performance of my tasks and exposing children or vulnerable people I come into contact with in the course of my work to any form of neglect or abuse (e.g. being distracted by students' needs, being easily irritated by young people's problematic behavior). Depending on emotional manifestations, signs of distress and factors linked to them (vicarious trauma, emotional exhaustion, etc.), I understand that I can refer to the Projet Jeune Leader Safeguarding and Protection Focal Point (**0384568710**) for an assessment and possible treatment or adequate referral.

I respect the confidential nature of the private lives of children, vulnerable adults, employees and all other people connected with Projet Jeune Leader.

I will not engage in the following behaviors:

I never behave towards others in a physical or verbal manner that is or might be interpreted as inappropriate or a form of harassment, abuse, discrimination, abuse of power or exploitation.

While working with Projet Jeune Leader I do not have physical contact with children, vulnerable adults and staff members such as: holding hands, hugging, kissing, or touching in an inappropriate or culturally inappropriate manner, even during exceptional occasions (e.g. birthdays, parties, etc.).

I do not wear the Projet Jeune Leader uniform, t-shirt and badge outside of my work-related professional activities and I do not use them in other contexts.

I never act in a sexually provocative manner and I never engage or involve a child in any form of sexual activity or act, including payment for sexual services.

I do not create sexually abusive images of children and I do not facilitate children's access to sexual or pornographic content. I never view pornography or pornographic content involving minors.

I do not exchange money, employment, goods, favors or services for sex, whether sexual favors or other forms of humiliating, degrading or exploitative treatment.

I do not use children to help me in my daily tasks (both personal and professional) or any task involving potential danger, interfering with their education, or prejudicial to their physical, psychological, moral, emotional, social or spiritual development.

I never use physical discipline on children.

**Article 12 : Principles and guidelines for ethical research and evaluation**

All researchers and those involved in carrying out evaluations and research at and for Projet Jeune Leader must understand and comply with the Projet Jeune Leader Code of Conduct set out in this Safeguarding and Protection Policy. Moreover, these individuals are required to meticulously comply with the principles and guidelines for ethical research and evaluation detailed below.

**Principle #1: Respect for human beings**

Respect is a primary consideration and means acknowledging the intrinsic value of every human being. As such, the opportunity for human beings to exercise empowerment and make their own decisions is essential, as is commitment to participants' well-being over and above the research objectives. Respect requires prior knowledge and consideration of the individual and collective cultures, values, customs, beliefs and practices of the people involved in the research. Respect involves respecting the rights, privacy, dignity and diversity of those who contribute to research.

Guidelines for principle #1

**1.1 Prior free and informed consent:** Research participants choose to take part with full knowledge of the research and their involvement. This decision must be communicated in clear, understandable language in a manner adapted to the participants' background, culture, age and cognitive abilities, knowing that the participant may withdraw their consent at any time.

***NB*** : Children are generally considered incapable of providing informed consent because they do not have the capacity and/or experience to anticipate the implications of an action, and they may not understand or be able to exercise their right to refuse.

**1.2 Researchers' competence:** Individuals doing the research or review are well-informed, capable and confident to ensure that the research environment is safe, secure and locally appropriate. Where possible, research policies and applicable guidelines in Madagascar should be

complied with. All members of the research team are subject to meticulous selection and each member benefits from specialized training and ongoing support. The importance of the research team's skills and training should not be underestimated as this ensures they are able to carry out research in a sensitive, secure manner. Furthermore, researchers are required to know the child protection laws, policies and procedures relevant to each institution where participants are recruited (schools, community groups, etc.) and be familiar with the child protection referral mechanisms in Madagascar. They are also trained and skilled in dealing with any disclosure of sensitive information and have a reporting or referral plan so they can respond appropriately.

**1.3 Privacy and confidentiality:** Research participants' rights and dignity must be respected at all times, before, during and after the study. It is nevertheless crucial to clearly explain the limits of such confidentiality to them, in particular the legal obligation to report any case of mistreatment revealed during the research. In addition, rigorous management of the data collected is essential to guarantee compliance with participants' confidentiality and, if necessary, their anonymity.

## **Principle #2: Beneficence**

An act of beneficence or charity is one carried out for the benefit of others. This principle implies that the expected benefit of research activities for participants, or for the community at large, justifies any risk of harm or discomfort for them. To satisfy this principle, research must not only have value for the participants, their community, their country, or for development practice more generally, but must also be designed to minimize potential risks.

Underlying this principle and all Ethical Principles is the concept of "do no harm" (non-maleficence). The harm may be immediate or long-term, and may be physical, social, emotional, psychological or cultural (such as retraumatizing or disrupting community life). The harm, or risk of harm, may come from partners or consultants, other staff or participants, the community, the State, or others acting on behalf of the State. Harm may also concern the well-being and safety of a person, institution or group.

"Do no harm" means that such risks of harm are anticipated, planned for, and that the likelihood of harm should be used to decide whether or not to proceed with the proposed research. Beyond harm to participants, this principle also requires consideration of potential harm to staff working on review and research; particularly in terms of safety, potential trauma and available support.

### Guidelines for principle #2

**2.1 Benefits for participants:** The research must involve certain expected benefits for participants that must be clearly communicated. Here are some examples of different types of potential benefits for those involved in research:

- New skills: Research participants develop new research skills through their involvement, which provides new opportunities for training and professional development.
- Improved program delivery: Participating in research enables Projet Jeune Leader to better meet the needs of the individual, community and/or society.
- Increased knowledge: Individuals and communities gain new knowledge based on the research and its findings. This knowledge may help their own advocacy or empowerment.
- Individual benefits: Participants have a chance to voice their concerns and articulate their problems to an independent observer without fear.

**2.2 Risk management:** Risks posed by research should be identified early and managed through effective planning and design, and formal or informal review, if necessary. Mapping local support mechanisms should be done in advance, so that the research team can give participants immediate advice on local support. Ideally, risk management planning and design should be entered in the Jeune Leader Research Risk Assessment/Review form and any potential unintended consequences

should be monitored during and after research or review data collection. (See Article 10 for research/review risks to be analyzed)

**2.3 Protection from harm:** Research must not cause harm to research participants or researchers before, during and after the research. The study design should include actions to reduce any possible stress caused to participants by the research. Regular debriefing sessions between research managers and data collectors should be planned as they are an important part of the research process, particularly because they let researchers unload and share any difficult experiences during the process. Researcher burnout is also an area to carefully consider when planning and designing any research/evaluation process.

### **Principle #3: Research merit and integrity**

Research merit and integrity means that the research is of high quality, well justified and well designed, and is carried out by individuals or teams with sufficient experience and competence.

Having merit and integrity also means that the research has clear objectives, questions, methodology and methods. Research integrity involves ensuring the accuracy or validity of research to produce new knowledge and better understanding. This commitment is particularly important in work where donors or government may have a vested interest that may or may not align with the research findings or analysis of them. Integrity also covers publishing and communicating findings to research participants to contribute to their knowledge, and more broadly to enable critical examination and preserve and protect the trust that participants place in those carrying out the research.

#### Guidelines for principle #3

**3.1 Design and methodology:** The research is designed using appropriate methodologies. When designing data collection methodologies, attention is paid to the following points, as further developed in Article 10:

- Meticulous selection of the terms, stories, illustrations used in order to avoid any act of stigmatization or judgment, etc.
- Respect for confidentiality and personal information;
- Verification and review of all tools used.
- Keeping participants from possible retraumatization.

**3.2 Participatory approaches:** A wide range of research participants are actively involved, as appropriate, in different stages of the research cycle, including design and planning, as well as review.

**3.3 Maintaining integrity:** P JL staff and research consultants must protect and maintain research integrity, including by managing potential or perceived bias, and responding effectively to any complaints.

### **Principle #4: Justice**

Justice as a principle refers to fairness: a fair process for recruiting research participants; no unfair burden of participation on particular groups; no deliberate exclusion of minority voices; and fair distribution and access to the benefits of research participation.

Justice also means that participants should not be exploited in carrying out research, and that their well-being should be protected. This principle involves treating all participants with dignity, regardless of gender, age, race, ethnicity, disability, religion and culture, and requires that those involved in the research and review are aware of existing power relationships, so that broader principles of human rights and equity may be respected.

This principle ultimately involves ensuring that we avoid further marginalization, discrimination and exclusion of under-represented people, such as those with disabilities, as well as other marginalized groups such as women and girls, ethnic minorities and the elderly. This may involve adapting the methods used to engage potential participants and collect data, including considering accessible communications and physical locations (e.g. the location of group discussions or developing child-friendly tools) to maximize the likelihood of underrepresented groups taking part.

Finally, justice requires that results be made available to participants in a timely, clear manner and in a meaningful format.

#### Guidelines for principle #4

**4.1 Considering vulnerable groups:** Including, considering and representing the views and voices of vulnerable groups are crucial in Jeune Leader's review and research efforts. However, research involving vulnerable groups, particularly children, requires additional ethical considerations, as vulnerability can add a more complex set of power relationships between researchers and participants at all stages of the research cycle.

**4.2 Fair and inclusive involvement:** Research participants must be selected and included equitably without any vulnerable person, community or group being excluded without good reason. Also, participants should not be unintentionally excluded because barriers to their participation have not been considered or overcome (e.g. when choosing the time and place of data collection activities, data collection tools and communication approaches). There must also be no unfair burden of participation on individuals or groups of people.

**4.3 Research dissemination:** Research findings should be shared with and disseminated to research participants and their communities in ways that are meaningful, age-appropriate, accessible to people with disabilities, and useful for their specific context or scenario.

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#### **Article 13 : Human resources management standards**

**Job offers** published by Projet Jeune Leader all include this statement about Jeune Leader's commitment to safeguarding and protecting from exploitation, abuse, and sexual harassment:

*Projet Jeune Leader is committed to safeguarding and promoting the well-being of everyone and expects all members of its staff to share this commitment. We have a zero-tolerance approach to anyone who infringes our Safeguarding and Protection Policy while performing their duties at Projet Jeune Leader. All applicants will be asked questions about child safeguarding and protection.*

The **interview questionnaires** used by Projet Jeune Leader during the applicant selection process include several questions aimed at assessing the applicant's knowledge and acceptance of the organization's safeguarding commitments. In fact, it is crucial to hire people aware of the importance of safeguarding, or wanting to enhance their knowledge on this subject, in order to maintain an organizational culture devoid of all forms of exploitation, abuse and harassment. No one is allowed to work with/for Projet Jeune Leader if they pose a risk to the safety or well-being of children and young people.

By including such questions in our hiring interviews, we seek to ensure that each potential member of our team shares our core values on protecting children and young people and is committed to maintaining a safe, respectful working environment, free from any form of abuse and harassment.

The **reference sheets** used by Projet Jeune Leader to complete each applicant's file include a question on safeguarding and protection:

*To your knowledge, is [X] currently under investigation or has he/she already been investigated for cases of exploitation, abuse, or harassment ?*

It is mandatory for at least one of the references to come from the applicant's last job and be issued by a person in a higher supervisory position, except for an applicant who has never worked. In this case, he/she must provide two academic, internship or volunteer references, excluding partners, spouses or other family members.

**Contracts issued by Projet Jeune Leader** (whether for employees, service providers, consultants, educators, volunteers, interns and regardless of how long the contract is or the department concerned) include this article specifying that the contractor must comply with the requirements of the Projet Jeune Leader Safeguarding and Protection Policy:

*“**Article X : Safeguarding and Protection** : The NGO Projet Jeune Leader is committed to safeguarding and promoting the well-being of all people – adults and children – who come into contact with our programs. The support and protection of children and vulnerable adults are priority areas for Projet Jeune Leader, which gives their interests priority. **Projet Jeune Leader has a zero tolerance approach towards any form of abuse, harassment, and exploitation of children, its teams, and anyone in a vulnerable position.** The Contractor [Employee/Consultant/Service Provider...] undertakes to read, understand, and comply with the Safeguarding and Protection Policy of the NGO Projet Jeune Leader (available here in French, Malagasy, and English: <https://fr.projetjeuneleader.org/sauvegarde>) and to sign the Code of Conduct of the NGO Projet Jeune Leader. The Contractor [Employee/Consultant/Service Provider...] also undertakes to attend any training provided by Projet Jeune Leader on this Policy during their duties at Projet Jeune Leader, according to established procedures. Failure to comply with this article is considered a serious offense authorizing Projet Jeune Leader, if it so wishes, to terminate the contract without notice.”*

**The Code of Conduct set out in this Policy is also appended to such contracts (employees, service providers, consultants, educators, volunteers, interns, etc.).** This Code must be signed at the same time as the contract, preceded by the words “read and approved.”

The Human Resources Director is appointed as primarily responsible for applying these human resources standards and procedures. He/she is responsible for sending all evidence of implementation of such standards to the Protection and Safeguarding Committee, such as copies of completed reference sheets, signed codes of conduct, etc.

#### **Article 14 : External partners' management standards on this Policy**

Projet Jeune Leader has formal partnerships with several governmental and non-governmental institutions and organizations, including ministerial bodies, public middle schools, school districts, national or international donors, as well as other civil society organizations. These partnerships are generally governed by conventions or partnership agreements.

**If the partner already has its own safeguarding and protection policy and Projet Jeune Leader is asked to adhere to it pursuant to collaboration,** then the Projet Jeune Leader Executive Director and the Safeguarding and Protection Focal Point review the partner's policy and request clarification if necessary. The Executive Director then signs Projet Jeune Leader's commitment to this external policy, without it replacing Projet Jeune Leader's internal policy (which continues to be applied). The Executive Director and/or the Focal Point attend any training the partner provides on this policy. If the external policy differs from the internal policy, particularly regarding complaint mechanisms, the Focal Point informs the relevant Projet Jeune Leader teams of such differences.

***NB:** Situations may also arise where the partner (donor) has its own safeguarding and protection policy, but only the Projet Jeune Leader policy applies to the activities carried out by Projet Jeune*

*Leader pursuant to the collaboration. This condition is specified in the financing or partnership agreements with the partner in question.*

**If the partner does not have a safeguarding and protection policy OR the partner's policy is not as comprehensive as Projet Jeune Leader's,** then partner organizations will be informed that Projet Jeune Leader has a Safeguarding and Protection Policy and that we are committed to these areas. To do this, the Executive Director includes the following paragraph in the partnership agreement/convention or other document governing the partnership:

*“The NGO Projet Jeune Leader is committed to safeguarding and promoting the well-being of all people – adults and children – who come into contact with its programs. The support and protection of children and vulnerable adults are priority areas for Projet Jeune Leader, which places their interests first. Projet Jeune Leader has a zero tolerance approach towards any form of abuse, harassment and exploitation of children, its teams, and anyone in a vulnerable position. The Projet Jeune Leader Safeguarding and Protection Policy (available here in French, Malagasy, and English: <https://fr.projetjeuneleader.org/sauvegarde>) sets out its commitments in these areas.*

*To report any suspicion or evidence of child or adult abuse – whether perpetrated by staff, volunteers, consultants, facilitators, or others associated with Projet Jeune Leader – please call or text the number **0384568710** or notify anyone connected with Projet Jeune Leader that you feel comfortable enough to report to.*

*Projet Jeune Leader expects all its partners to share these same protection and safeguarding commitments. Projet Jeune Leader therefore reserves the right to terminate any agreement, undertaking, or convention – however formal it may be – with partners who act contrary to or contradict such commitments.”*

The Executive Director is appointed as primarily responsible for communicating these principles to external partners. He/she is responsible for sending all relevant evidence to the Safeguarding and Protection Committee.

### **Article 15 : Prevention through program activities**

Projet Jeune Leader acknowledges that adolescents, particularly females, are vulnerable to abuse. Adolescence is a critical period during which young people form their attitudes and values regarding violence, particularly gender-based violence.

Through our holistic comprehensive sexuality education program, we equip adolescents with the knowledge, skills, attitudes and confidence to make healthy, informed decisions about their relationships, lives and health. This is aimed at reducing their vulnerability to all kinds of abuse. We also help adolescents develop the confidence to limit their exposure to violent situations and be able to report abuse or threats of violence. By building confidence in themselves and their ability to recognize and respond to dangerous situations, we aim to empower adolescents and help them build healthy, respectful relationships, while strengthening their ability to protect themselves against abuse.

### **Article 16 : Communication standards**

Projet Jeune Leader is committed to constantly representing children in an appropriate, respectful and consensual manner. **The following standards should therefore be adopted in communication** (photos, videos, audio recordings, social media, etc.): :

- Respecting the dignity of the people photographed; ensuring that children are properly dressed.
- Not taking photos, or attempting to do so, if they might be considered intrusive or insensitive, such as photos in homes, sleeping areas, people bathing or in distress.
- A child must always be depicted in a dignified, respectful manner, not as vulnerable, submissive, or in poses that might be perceived as sexually suggestive. He/she will be portrayed as part of their community and not isolated.
- Never making recordings or images that might be interpreted as sexually suggestive.
- Never using images for personal purposes or sharing them on personal social media.
- Making sure that you have school principals' consent before photographing or filming adolescents or before using such content, even if the child is a relative of a staff member's close or distant family. When requesting consent for using the image, details must be provided about how and where this image will be used. It is strictly prohibited to share photographic or video content for personal purposes or on your own social media.
- Not identifying the child when posting images. And, when sending images electronically, not revealing any child's identifying information on file labels.
- Not touching up images if this changes the honest content of the context and facts (dwellings, clothing, coloring, etc.).
- Not taking photos or videos of students, schools and their parents without having been called on to do so by the Projet Jeune Leader communications team.

# PART 3 : Training and Awareness

## Article 17 : Initial training on this Policy

### On entering Projet Jeune Leader

**All staff under long-term contracts with Projet Jeune Leader** (be they as employee, volunteer, consultant, etc.), all departments combined, are trained on the entire content of this Policy during their onboarding when they take up their duties at Projet Jeune Leader. Training will be carried out by the Safeguarding and Protection Focal Point or the Executive Director, using the training program designed by the Safeguarding and Protection Committee. This initial training course is comprehensive and interactive, aimed at responding to the various possible scenarios that contractors might face pursuant to their work with Projet Jeune Leader. The course ends with a comprehension quiz; People with a low score will be asked to repeat the training and/or benefit from individual support from the Focal Point to better assimilate the course content. An **Internal Training Session Report** will be co-signed by those trained and the trainer/facilitator; the result of the post-training comprehension quiz will also be appended to this report. The Human Resources Director is required to communicate this signed report to the Safeguarding and Protection Committee.

**For those under short-term contracts with Projet Jeune Leader**, the Safeguarding and Protection Committee is responsible for determining whether or not they need to go through Projet Jeune Leader training on the Policy. Among other considerations, the Committee will assess what kind of contact the contractor has with children and vulnerable adults and how often.

## Article 18 : Additional training for certain staff members

Projet Jeune Leader educators as well as the program/technical/review and research teams (be they consultants or employees) have additional training provided by the Safeguarding and Protection Focal Point or other qualified people at Projet Jeune Leader. These training courses cover a range of subjects, including (non-exhaustive list):

- Adopting benevolent, professional stances aligned with Projet Jeune Leader activities or values.
- Referral methods in the field, i.e. the procedures for directing individuals to the appropriate resources if necessary.
- Self-care and prevention techniques for psychosocial risks linked to doing their job and being exposed to a complex work environment.
- Methods for raising awareness among people or partner organizations about the activities carried out and briefing techniques on Projet Jeune Leader's Safeguarding and Protection Policy.
- Ethical principles to comply with during research and evaluations.

The Safeguarding and Protection Focal Point monitors and supports the teams who have had such additional training and apply it in their day-to-day work.

#### **Article 19 : Refresher courses on this Policy**

All staff under long-term contracts with Projet Jeune Leader (regardless of their status and department) are required to complete a yearly refresher course on practices and this Policy in order to update their knowledge. This course may be delivered online or in person depending on needs. A Training Confirmation Report is co-signed by the person(s) trained and the trainer/facilitator. The trainer then sends this report to the Safeguarding and Protection Focal Point, so that course attendance and renewed commitment to the principles and practices set out in the Projet Jeune Leader Policy is formally documented.

In addition to formal training, the Safeguarding and Protection Committee will work to build an organizational culture at Projet Jeune Leader where safeguarding and protection issues are openly and frequently discussed. To do this, the Focal Point may conduct short conversations on this subject, e.g. during monthly team meetings.

#### **Article 20 : Training for certain external partners**

Projet Jeune Leader acknowledges how important the **principals of partner middle schools** are as sources of information on the local context and that they may sometimes be references for students. With this in mind, Projet Jeune Leader is committed to raising awareness and supporting these principals in their roles. Specific contents of this Policy are discussed during the first briefing meeting when starting to work with these partner middle schools. In addition, the **middle school principal partnership guide** will include the Projet Jeune Leader Code of Conduct as a reminder and to encourage principals to report any behavior that infringes that Code.

In addition, Projet Jeune Leader may provide training on safeguarding and protection topics to other collaborators (civil society organizations, ministerial partners), to ensure that they fully understand the principles and practices set out in this Policy. These training courses for external partners may be provided by the Projet Jeune Leader technical/program team.

#### **Article 21 : In-house circulation of this Policy**

The digital version of this Safeguarding and Protection Policy is fully available on the Projet Jeune Leader website, in French, Malagasy and English [<https://fr.projetjeuneleader.org/sauvegarde>]. Additionally, a hard copy of the policy is available at the Projet Jeune Leader offices. Finally, to promote ongoing awareness of the culture of abuse prevention, an abridged version of the Policy is posted up in all Projet Jeune Leader premises.

#### **Article 22 : External awareness raising on this Policy**

Projet Jeune Leader recognizes the importance of ensuring that children, young people and vulnerable adults are informed of their right to be protected from abuse, and that they also know where to find advice and support if their security is violated.

During events organized by Projet Jeune Leader.

Any person contracted with Projet Jeune Leader and involved in conducting or participating in events organized on behalf of the organization is required to raise awareness of the procedure in place for reporting abuse and potentially disturbing behavior. Events include, among others (non-exhaustive list): workshops for parents, training for partners, symposia with school principals, etc. **The following introductory sentence is used at the start of any event organized by Projet Jeune**

**Leader:** *“Projet Jeune Leader works with the aim of guaranteeing a healthy, fulfilling environment, and is concerned with the rights of each individual with whom it interacts. We therefore encourage you to report to us any actions or words that go against these values during or after this meeting. To report such concerns, you can call or text 0384568710, speak to the school principal, or speak to anyone connected with Projet Jeune Leader. Thank you for your cooperation in contributing to a better world.”*

This paragraph will be added to work and pedagogy tools as a reminder for the teams.

In documents shared with the Projet Jeune Leader audience.

**Documents intended for the public or the school community**, such as the principals' guide, EKO and "VINA" magazines, both the existing and newly printed ones, will now bear a sticker with the following text:

*“Projet Jeune Leader is listening to you! You can text us or call us on 0384568710 if a gesture, word or behavior by a Jeune Leader Mpanabe/Jeune Leader facilitator-educator or any person connected with Projet Jeune Leader bothers you or makes you uncomfortable. You can also share your concern with the school principal. Thank you.”*

# PART 4 : Safeguarding Structures

## **Article 23 : Roles and Composition of the Safeguarding and Protection Committee**

The **responsibility** for creating a favorable environment, free from any behavior contrary to this Policy, lies with **all Projet Jeune Leader staff**.

However, there is a specific Safeguarding and Protection Committee to: facilitate implementation of this Policy, make possible improvements based on changes in circumstances and new risks that may arise, raise awareness on the subject among Projet Jeune Leader staff and collaborators, and manage incidents.

The Committee is made up of the following members, each having the following skills and roles (*these people's Safeguarding roles are included in their Terms of Reference to formalize their commitment to carry out such roles in a fully professional manner*):

### **Safeguarding and protection focal point (a person external to Projet Jeune Leader).**

**Profile** : This person is familiar with Projet Jeune Leader programs, and has a psychology degree, safeguarding and protection expertise in social organizations and experience in the psychosocial support of children, adolescents and vulnerable people.

**Roles** : Generally speaking, the Focal Point plans and coordinates implementation of safeguarding activities and is a resource person for the entire team regarding safeguarding-related issues. More specifically, they are responsible for first receiving complaints, concerns or suspicions originating from the reporting number. They then document such information and implement the decisions made by the Committee, which may include coordinating with the police, social agencies or other state agencies. The Focal Point also provides direct support to the people affected. In addition, they ensure that all staff are informed of possible changes to the Policy and implement staff training programs. Finally, the Focal Point is responsible for organizing staff's signed codes of conduct.

### **Safeguarding and protection consultant (a person external to Projet Jeune Leader).**

**Profile** : This person is a member of the Projet Jeune Leader Board of Directors. They have specific expertise in safeguarding and protection in social organizations, as well as the knowledge needed regarding the organization's operations.

**Role** : The safeguarding consultant's key task is to replace the focal point if they are absent or if the focal point itself is the subject of a complaint. In addition, they may take over the management of reporting cases if the focal point is overloaded with work. Furthermore, they attend the various meetings held by the Committee and facilitate any communications that may involve the whole Board of Directors.

### **Projet Jeune Leader Executive Director.**

**Profile** : This person has had in-depth training on safeguarding and protection issues. In addition, they have strong expertise in the organization's context.

Role : The Executive Director attends Committee meetings and is responsible for keeping the safeguarding and protection risk register. In addition, they support team training and capacity building on this Policy. The Executive Director plays a crucial role in decisions related to the organization's human resources and acts as a contact person with financial partners.

**Projet Jeune Leader Human Resources Manager.**

Profile : This person is familiar with human resources and organizational management. In addition, they are familiar with the organization's history and personnel in partnership with Projet Jeune Leader. This person has had training on safeguarding and protection issues.

Role : The Human Resources Manager has an essential role as a permanent contact person for the organization's permanent and temporary teams. As part of their job, the Human Resources Manager attends and participates in Committee meetings and is primarily responsible for monitoring signed statements on the various codes and Policies in place, as well as renewing them. In addition, they take an active part organizing team training and capacity building on this Policy. In addition, the Human Resources Manager is responsible for checking references provided by applicants during hiring, as well as compliance with administrative hiring prerequisites.

**Article 24 : Meetings of the Safeguarding and Protection Committee**

Committee meetings are held on a minimum quarterly basis, during which members may:

- Discuss and update (if necessary) the Projet Jeune Leader risk register as presented in Article 9.
- Discuss possible changes to be made to this Safeguarding and Protection Policy. If changes are made, the Committee is responsible for updating all hard and digital copies of the Policy and informing under-contract Projet Jeune Leader staff that changes have been made. This information may be shared via team communication channels.
- Review any reports of safeguarding or protection issues that have arisen since the last meeting and ensure that procedures are properly followed.
- Assess the need for additional training on such topics for staff or external partners.
- Address any other relevant safeguarding and protection related issues to ensure a proactive approach.

# PART 5 : Reporting concerns

## Article 25 : Principles for Reporting Concerns

This part of the Policy is aimed at encouraging and empowering all employees, and anyone connected with Projet Jeune Leader in any way, to report protection and safeguarding issues. The goal is for Projet Jeune Leader to intervene and address these concerns or incidents as quickly as possible.

In the event of incidents, comments, suspicions or concerns, the case must be immediately reported to the Safeguarding and Protection Committee (directly via the reporting number or indirectly via any person connected with Projet Jeune Leader) who will analyze them and possibly launch an investigation. For the sake of fairness, the Committee will treat with the same consideration any report of cases of professional abuse or harassment within the organization or pursuant to performance of Jeune Leader's operations. Cases of workplace abuse will be treated according to established procedures, in the same way as cases of mistreatment of children and vulnerable people. When responding to concerns or allegations of harm or abuse, **the ultimate guiding principle will be to look out for the best interests and well-being of the child or person experiencing mistreatment/abuse.**

Anyone who reports a concern, or states they are a victim of abuse, will be protected, listened to and treated with respect in a fair and equitable manner. They will be assured that they are not responsible and will never be treated with disbelief or in a manner likely to cause shame or embarrassment.

## Article 26 : Reporting Procedure

If a person is a victim or if they suspect an infringement of their rights, safety, well-being or a breach of this Policy, they are required to report it immediately or as soon as they feel comfortable enough to do so.

Thanks to an appropriate, effective reporting system, Projet Jeune Leader aims to deal with all incidents as quickly as possible and in complete confidentiality. There are several possible options for reporting an incident or concern.

***N.B.:** These options apply in any type of safeguarding and protection incident or concern, in particular 1) if a person in contact with Projet Jeune Leader is a victim of abuse or suspects they have suffered an infringement of their rights, safety or well-being, and 2) if a person notices a breach of this Safeguarding and Protection Policy.*

**Option 1- Report to anyone connected with Projet Jeune Leader that you feel comfortable enough to report to.** This person will in turn report to the Safeguarding and Protection Focal Point via the reporting number.

**Option 2- Call, text, or send a WhatsApp message to the 0384568710 number.** This number is held by the Safeguarding and Protection Focal Point for receiving complaints and reports.

## Article 27 : Difference between Projet Jeune Leader reporting number and the 147 line

	147 toll-free number	0384568710 number
Type :	National Line	Specific to Projet Jeune Leader
How ?	Call	Call Text WhatsApp
To report :	Any suspicion and any act of abuse	Any suspicion and any act of abuse
Done to :	<b>Only</b> children	To children, vulnerable adults and members of Projet Jeune Leader staff (employees, consultants, service providers, etc)
By :	Any person in the community	People acting in the name of Projet Jeune Leader (employees, consultants, service providers, Jeune Leader educators and Jeune Leader Mpanabe, etc.) and people in contact with Projet Jeune Leader
Where	Everywhere : in the community, neighborhood, etc.	In Projet Jeune Leader workplaces (e.g. Projet Jeune Leader partner schools)  In PJJ offices and workplaces
Complaint handling deadline	Not defined	Within 24 to 48 hours

**Article 28 : Non-Retaliation**

It is contrary to Projet Jeune Leader's values to retaliate against a person who, in good faith, reports a breach or suspected breach of this Policy or the Code of Conduct. Any staff member who retaliates against a person who has reported an infringement in good faith is subject to disciplinary action up to and including dismissal.

**Article 29 : Confidentiality**

Projet Jeune Leader undertakes to maintain confidentiality as much as possible. Information on safeguarding matters will only be shared with specific people, primarily the Safeguarding and Protection Committee. In some cases, it may be legally mandatory to disclose such information to the competent authorities such as the Police, Gendarmerie or Ministry of Population.

In the event of a child abuse complaint, the Committee will inform and involve the parents or those responsible for the child, explaining to them their rights and the procedures to follow in accordance with Malagasy law.

All information, including correspondence and investigation reports, will be kept secure with access restricted to the Committee. Under no circumstances will it be accessible to the general public.

# PART 6 : Response Systems

Projet Jeune Leader implements these measures with the following goals: 1) to deter future abusive behavior and 2) to support the survivor to promote their recovery and well-being.

## **Article 30 : Investigation steps**

After the Projet Jeune Leader Safeguarding and Protection Focal Point receives a concern, the following steps will be followed:

**Step 1** - The Focal Point will complete a **digital form** which will include the information shared on the complaint/suspicion received.

*As appropriate and needed*, if the information is not complete, the Focal Point will contact the complainant (less than 24 hours after the complaint is made) to complete the information and evidence received.

**Step 2** - All members of the Safeguarding and Protection Committee will be (automatically) notified of the new concern reported. **The Committee will then meet** as soon as possible (less than 48 hours after the complaint). During this meeting, the Committee will analyze and consider the following factors:

- The survivor's immediate needs, e.g. if urgent medical, legal, psychological services are required,
- The survivor, and other persons involved if necessary, is informed of their rights, the action to take and procedures to follow depending on the case,
- The potential risks of directing the survivor to certain services,
- The survivor's individual characteristics (e.g. age, disability, language spoken) and how this might affect the support they need,
- The risk of repeated harm to the survivor or harm to others. E.g. family members, witnesses, people related to the survivor or alleged perpetrator.

Depending on the analyses of the situation, the Committee may then proceed with the following actions (non-exhaustive list):

**For concerns about exploitation, abuse and harassment not involving Projet Jeune Leader**, the Focal Point will direct the complainant to the national reporting number or other applicable reporting methods in Madagascar.

**For concerns of exploitation, abuse and harassment involving Projet Jeune Leader in any way**, the Committee will draft the **terms of reference** for the investigation to be carried out. These will define the various investigation parameters such as the objective, the people responsible for the investigation (...) as well as a reminder of the requirements to be able to carry out the investigation. Depending on the case, an investigation plan may also be attached to the terms of reference. The Safeguarding and Protection Committee will also ensure referral to various institutions according to urgency, need and possibility, as well as monitoring the various treatments and how the condition of the person concerned develops. It will ensure that the survivor is informed of the referral and support steps and that the survivor states their consent to any step taken.

- **If the complaint involves a Projet Jeune Leader employee in connection with suspected emotional, sexual or physical abuse of a child or adult**, the employee will be notified to stay away from work for an indefinite period, pending the outcome of the investigation and the Committee's decision. It is important to note that this decision is not linked to the employee's guilt or innocence but is done to protect both parties during the course of the investigation.
- **If the complaint involves a non-employee Projet Jeune Leader contractor (be they a volunteer, intern, facilitator-educator, consultant or service provider) and suspected emotional, sexual or physical abuse of a child or adult**, the staff member or contractor will be suspended pending the outcome of the investigation and the Committee's decision. It is important to note that this suspension does not necessarily imply guilt, but is done to protect both parties while the investigation proceeds.
- **If the complaint involves a member of the Safeguarding and Protection Committee**, they will be immediately suspended from their job on the Committee, which will be responsible for appointing their temporary replacement during the investigation and decision-making period. If the complaint involves the Safeguarding and Protection Committee's Focal Point, the complainants are required to report this to the Executive Director at [maia@projetjeuneleader.org](mailto:maia@projetjeuneleader.org) or the Human Resources Director.

**Minutes** will be drawn up after the meeting clearly setting out the decisions and procedures to be put in place. The Safeguarding and Protection Committee will ensure that it facilitates the application and monitoring of the procedures and decisions announced therein. Furthermore, the Committee will ensure complete confidentiality throughout the process.

Step 3 - If it is decided to investigate the complaint, the Safeguarding and Protection Committee will be responsible for **planning, carrying out, managing and monitoring the investigation** in accordance with the terms of reference defined for the case, while maintaining regular contact with the presumed "survivor." The investigator(s) will write an **investigation report** which objectively notes all the facts and evidence. This report will be sent to the Committee as quickly as possible.

Step 4 – On receiving the investigation report, the **Safeguarding and Protection Committee will meet again to discuss the outcome**. If support was initially triggered (in step 2), the Focal Point will also share updates on this subject.

***NB** : Whatever decision is taken after these various steps, a closing report will be drawn up to keep a historical record, refine future interventions and help review the Policy.*

### **Article 31 : Handling an unfounded complaint**

If an allegation made in good faith proves to be unfounded or false, no action will be taken against the person who made the allegation.

However, in the event of an allegation made in bad faith, i.e. an allegation that is completely unfounded, malicious or made with intent to harm or knowingly false, disciplinary action will be taken. Deliberately making false allegations is a serious disciplinary offense.

Furthermore, individuals found to be witnesses but who did not report the abuse to the Committee will also be assessed by the Committee and may be held accountable and subject to disciplinary action.

### **Article 32 : Handling a well-founded complaint**

**If the incident is committed by a Jeune Leader staff member and breaches the acts described in the Code of Conduct**, dismissal will usually ensue. As stipulated in the Staff Rules and Regulations – which have been approved by the Labor Inspectorate: "Dismissal without notice involves the

following faults: [...] “Act against the Projet Jeune Leader Child Safeguarding and Protection Policy” and, as stipulated in the contract “Non-compliance with this Article [on Safeguarding and Protection] is considered a serious breach authorizing Projet Jeune Leader, if it sees fit, to terminate the contract without notice.” The Committee may also file a report with the competent authorities for sanctions and legal proceedings.

If it involves a breach of other articles of the Policy, varying degrees of disciplinary measures will be taken and applied as jointly decided by the Committee.

**If the incident is committed by a non-employee contractor (consultant, intern, volunteer or service provider),** the contract termination clause takes immediate effect. In fact, as stipulated in consultant and service provider contracts: “Non-compliance with this Article [on Safeguarding and Protection] is considered a serious breach authorizing Projet Jeune Leader, if it sees fit, to terminate the contract. without notice.” The Committee may also file a report with the competent authorities for sanctions and legal proceedings.

**If the incident is committed by a member of the board of directors,** the Safeguarding and Protection Committee informs the whole board of directors. An extraordinary General Assembly will be held during which the decision to suspend the member concerned will be made official.

*NB: In the event of abuse committed by one of these aforementioned groups on a child participating in our programs, Projet Jeune Leader undertakes to provide first aid to the child victims, including their access to care centers, a safe environment and giving them the initial psychological support they need.*

**If the incident is committed by any other person not directly connected with Jeune Leader (parent, entourage, school principal, etc.),** the collaboration links with that partner may be broken off. In addition, any person connected with Projet Jeune Leader (employee/service provider/facilitator-educator, etc.) who reported the incident may be reassigned to an area where they will feel safer. The Committee may also report the incident to the appropriate authorities for sanctions and legal action.

*NB: If abuse is committed on a person contracted by Projet Jeune Leader, the person who suffered the abuse may benefit from psychological support in the event of distress.*

Whatever the decision taken, a closing report will be drawn up by the Committee to keep a historical record, refine future interventions and help review the Policy.

### **Article 33: Rehabilitation measures**

Projet Jeune Leader acknowledges that there are likely to be strong feelings among employees, parents, children and/or the community that will need to be addressed after a suspected or alleged incident of abuse has been the subject of an investigation:

- Communication issues, especially if it is a rumor or a proven fact
- Feelings of guilt and blame may arise, particularly if it has been suspected for some time.
- The impact on the individual and the type of incident must also be considered.
- Finally, it is important to recognize the risk of harm to Projet Jeune Leader’s image and reputation.

Being aware of such potential consequences, the Committee may agree on additional rehabilitation measures, such as issuing public press releases or organizing community dialogues. The Committee may also decide to update the Policy.



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