Commonwealth Secretariat Safeguarding Policy for Children, Young People, and Vulnerable Persons

1. PURPOSE

Purpose of policy

1.1 The Commonwealth Secretariat acknowledges that the nature of its work includes bringing staff, consultants, and project partners into contact with children, young people, and vulnerable persons. As such, ComSec acknowledges that it has a responsibility to ensure the safety of all children, young people and vulnerable persons by minimising the harm that may be done as a result of our activities.

1.2 The purpose of this policy statement is to:
   a) Ensure that the Commonwealth Secretariat takes all possible steps to ensure the safeguarding of children, young people and vulnerable persons against all forms of violence and creates an open and aware environment where concerns for the safety and wellbeing of a child, young person, or vulnerable person can be raised and managed in a fair and just manner, which protects the rights of all.
   b) Reflect our commitment to respect, promote, uphold, and protect the rights of the child as set out in the UN Convention on the Rights of the Child and in line with ComSec values.
   c) Provide staff and any person carrying out work for, or on behalf of the Secretariat, with the overarching principles that guide our approach to protection of children, young people and vulnerable persons.

2. SCOPE

2.1 This safeguarding policy applies to any person carrying out work for, or on behalf of the Secretariat including:
   a) trustees,
   b) board members,
   c) directors,
   d) managers,
   e) project officers,
   f) staff,
   g) young professionals,
   h) interns, volunteers,
   i) contractors, and
   j) consultants

2.2 This includes persons based in the ComSec offices in London, Geneva and New York, as well as anyone based in other countries or on mission.
2.3 All Representatives of partner organisations and accredited organisations who will be in contact with children, young people and vulnerable persons while working for, with or on behalf of ComSec are expected to comply with this Policy.

2.4 Additionally, all ComSec partners and accredited organisations must have their own safeguarding policies and procedures in place that are consistent with this Policy and/or must commit to comply with this Policy whilst their own safeguarding policies and procedures are under development.

2.5 ComSec will treat any breach of this Policy seriously. Failure to comply with this Policy may incur sanctions ranging from disciplinary action (including possible dismissal) to termination of contracts or partnerships, and where appropriate, may result in referral to the police or other relevant authorities.

3. LEGAL FRAMEWORK

3.1 The safeguarding standards are based on international best practice and reflect the values, principles and protections enshrined in the United Nations Convention on the Rights of the Child (UNCRC).

4. SUPPORTING DOCUMENTS

4.1 This policy statement should be read alongside our organisational policies, procedures, guidance and other related documents, including:
   a) The Staff Handbook
   b) The Whistleblowing Policy

5. POLICY STATEMENT

5.1 ComSec is fully committed to the gender responsive safeguarding of all children, young people and vulnerable persons from all forms of violence. We take very seriously our responsibility to ensure that we, as an organisation, and anyone who represents us, does not in any way harm, abuse or commit any other act of violence against children, young people and vulnerable persons or place them at risk of the same.

5.2 We recognize all children, young people and vulnerable persons, regardless of age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marital status or civil partnership, pregnancy, maternity have an equal right to protection from all types of harm or abuse. We take a zero policy approach to all forms of violence against children and young people. We will challenge and do not tolerate inequality, discrimination or exclusion.

5.3 We understand that the effects of abuse of children, young people and vulnerable persons are both devastating and long term and we pledge to do all that is practically feasible to provide follow-up support to that child, young person and vulnerable person, particularly through referral to appropriate agencies, and at the very minimum ensure that the child,
young person, or vulnerable person is at no risk of experiencing that same harm.

5.4 To guarantee the effectiveness of this Policy, ComSec will ensure that:
   a) There is a designated safeguard lead (DSL).
   b) There is a Safeguarding Team that meets at least three times per year to ensure that relevant data is gathered to monitor organisational safeguarding practices and promote learning.
   c) Implementation and effectiveness of this Policy is reviewed annually and the Policy is updated based on findings.
   d) A safeguarding report is compiled on an annual basis.

6. SAFEGUARDING ROLES AND RESPONSIBILITIES

6.1 Designated Safeguarding Officer
   a) To be the point of contact within ComSec for any issues relating to safeguarding
   b) To support the senior leadership in managing any safeguarding concerns/investigations that may affect the reputation and standing of the organisation
   c) To report any serious safeguarding incidents to the appropriate authorities and/or police in-country, as appropriate or required by applicable law or this Policy

6.2 Designated Safeguard Lead (DSL)
   a) To promote awareness of this Safeguarding Policy and monitor its implementation
   b) To act as a source of support and information for staff and others who are required to comply with this Policy, and where appropriate, grassroots partners, on safeguarding issues
   c) To identify training needs and provide capacity development where needed
   d) To maintain clear records of any safeguarding concerns that are reported and the actions taken to address these concerns
   e) To report any in-country issues or concerns to the regional program director and the Global

6.3 Safeguarding team
   Key individuals within ComSec make up the Safeguarding Team. These are the DSL, the designated safeguarding officer, and the designated staff members. The aims of the team are:
   a) To promote consistency in the implementation of the Safeguarding Policy across the organisation
   b) To analyze data on safeguarding incidents and to generate learning and improve practice
   c) To develop tools and training to support the implementation of the Safeguarding Policy
   d) To conduct an annual review of safeguarding implementation and effectiveness across the organisation
   e) To coordinate an annual report on safeguarding

6.4 Contact Details
Designated Safeguarding Lead (DSL) | Director, Human Resources & Facilities Management
---|---
Safeguarding Officer | Legal Counsel
Safeguarding Team | Includes the Safeguarding lead and one designate from the following Divisions:
| - Gender
| - Human Rights
| - Youth
| - Events
| - Procurement
| - Human Resources
Anonymous Reports/Whistleblowing | Please refer to the Whistleblowing Policy

7. SAFEGUARDING WITHIN HUMAN RESOURCES

Safe Recruitment

7.1 ComSec seeks to recruit staff who are committed to the highest standards of personal and professional conduct. This goes beyond simply complying with protocols and extends to ensuring that individuals have an appropriate set of personal and professional values and are committed to promoting the safety and well-being of children, young people and vulnerable persons.

7.2 Recruitment of Staff

a) Appointments of all new staff are conditional on a criminal record check from the relevant country, three references, as well as a copy of an official photo ID as proof of identity.

b) For staff roles that include contact with children, young people and vulnerable persons, the job description will highlight this and questions are included in interviews relating to safeguarding.

b) Compliance with the Safeguarding Policy is a requirement for each staff member.

Staff Training and Support

7.3 ComSec will provide training and support designed to ensure that staff and others required to comply with this Policy understand their safeguarding responsibilities and have the knowledge and skills necessary to fulfil their responsibilities.

a) Compliance with this Policy is a requirement in all employees' contracts.

b) An acknowledgement of receipt of this Global Safeguarding Policy is included in the onboarding
c) Capacity development on safeguarding is provided across the organisation on a regular basis, including refresher training within three months of the Safeguarding Policy being updated.

d) Supervision of staff and volunteers will be provided where appropriate.

Volunteers and Interns

7.4 Interns follow the same staff recruitment process as staff.

Consultants

7.5 Consultants of ComSec include consultants, contractors and service providers whose work for ComSec involves direct or indirect contact with children, young people and vulnerable persons (to the extent such contractors or providers are legal entities, then the references to Consultants shall refer to those individuals whose work for ComSec through such entities involves direct or indirect contact with children, young people and vulnerable persons).

a) Consultants are provided with a copy of this Policy prior to work commencing, which they must read and sign a commitment to adhere to.

b) Expectations with regard to safeguarding are explained in induction prior to undertaking assignments that involve direct or indirect contact with children and youth.

c) Contracts for Consultants include a clause requiring compliance with this Policy and the consequences of a breach.

d) Consultants of Comsec partners must adhere to the partner organisation’s own safeguarding policies during the duration of the partnership.

e) Background checks are completed on Consultants contracted by ComSec to work directly with ComSec partners where they may come into contact with children and youth.

Visitors

7.6 When ComSec guests participate in partner visits with our staff, we will ensure that:

a) There is a clear purpose and reason for their visit (e.g., donor visiting a project, volunteer from a partner offering a brief training session).

b) We provide a review of relevant local context and customs.

c) We provide them with a copy of this Safeguarding Policy and they are briefed on any additional safeguarding measures required by the partner and they commit in writing to comply with the Policy and partner specific safeguarding measures.

d) They are not left unsupervised at any time with children, young people, and vulnerable persons.

8. PROJECT MANAGEMENT

Safeguarding in projects

8.1 ComSec has a responsibility to take all reasonable steps to prevent foreseeable harm in any activity or interaction it is responsible for. This includes a responsibility to ensure that partners have the competence to fulfil their responsibilities safely and have the policies and procedures in place to prevent harm or abuse to children, young people, and vulnerable persons.
8.2 ComSec is responsible for ensuring that the organisation’s funds are used properly and that due diligence checks are conducted to identify and verify who our partners are, to ascertain that they have the capacity and skills to deliver initiatives safely, and to monitor their activities and conduct. This responsibility is delegated to the Heads of each division/section.

8.3 To ensure that our projects are working to safeguard children, young people and vulnerable persons, the following measures are in place:

a) Due diligence/risk assessment checks of all prospective partners are completed, including a review of the policies, procedures, and processes that are in place to safeguard children, young people and vulnerable persons. Partners must fulfil the terms of their Letter of Agreement/MOU, which includes having a safeguarding policy in place by the end of the first full year of funding and committing to comply with this Policy in the interim.

b) Where personally identifiable data, including research involving children, young people and vulnerable persons, is shared between ComSec and the partner, a written data-sharing agreement is developed that covers the standard guidelines for ethical research of human subjects, including informed consent where relevant.

c) Where necessary, ComSec provides additional capacity development to ensure the appropriate safe practices and policies are in place to ensure children, young people and vulnerable persons are safeguarded.

Visits to Partners

8.4 When visiting ComSec partner organisations, ComSec personnel must adhere to the partner’s own safeguarding and child protection policies and processes for the entire duration of the visit, as well as this Policy, including the ComSec Safeguarding Code of Conduct, while in the field. It is recommended that this information be requested prior to the visit whenever possible, to ensure adequate preparation is made.

8.5 Should our partners be concerned about the behaviour of ComSec staff or others subject to this Policy, they can report their concerns by emailing our DSL directly. ComSec will investigate all reports, and the fact of notifying ComSec of concerns will not impact the funding relationship between ComSec and the partner organisation.

Adaption to the Local Context

8.6 When working in different areas of the world, ComSec believes that:

a) Every child, young person and vulnerable person has the right to be protected from all forms of violence, abuse, and maltreatment, irrespective of their nationality, race, religion, or socioeconomic status.

b) Respect for local laws and customs is critical in following the appropriate reporting and response procedures when working with our partners to keep children, young people and vulnerable persons safe in diverse contexts. We understand that each country in which we operate has a different approach and understanding of what safeguarding means.

8.7 We understand that each country in which we operate has a different approach and understanding of what safeguarding means. Our regional programs teams will play a key role in
supporting our partners to ensure that they are meeting the local context, as well as ensuring that the ComSec Safeguarding Policy remains fit for purpose within the context.

8.8 No matter where our staff, consultants, volunteers or interns are in the world when visiting our partner organisations, if they see something that makes them feel uncomfortable or they become worried about someone’s safety, they must report directly to the DSL and, if appropriate, to the person responsible in the partner organisation. If the concern is about the partner, then this must be reported immediately to the DSL. If a child or youth is in immediate danger, ComSec staff, consultants, volunteers and interns must call the relevant local authorities and then report immediately to the DSL.

9. CHILDREN AND YOUTH PARTICIPATION

9.1 The United Nations Convention on the Rights of the Child establishes children’s right to participate and to have their views taken into account in matters that affect them. For the purposes of this Policy, participation is understood to be activities or initiatives where ComSec invites children or youth to take an active role in the delivery of our initiatives or to share their views, ideas, and experiences as part of our work.

9.2 Participation

a) In order to safeguard their needs, children, young people and vulnerable persons (and their parents/guardians/carer) are provided with information in advance that explains the initiative and the role they are being asked to fulfil. They are given time to consider the request, and it is made clear that their participation is voluntary.

b) Where children, youth or vulnerable persons agree to participate, a written agreement is produced outlining ComSec’s expectations of them, the support they can expect from ComSec, and the extent/limit of their ongoing involvement. The agreement is signed by the child/young person or vulnerable person and their parent/guardian/carer, confirming their informed consent to participate. Separate consent is obtained for the use of any information provided by children and youth.

10. SAFEGUARDING IN COMMUNICATIONS

10.1 In our marketing and communications, COMSEC believes in:

a) **The best interests of the child/youth/vulnerable person**: The public use of images and stories of children, youth and vulnerable persons inevitably poses potential risks. Where there is a risk of potential negative consequences for children and youth, we make decisions that favour their safety and protection.

b) **Dignity**: In our communications, we uphold the rights and dignity of the child youth, or vulnerable person their family, and the wider community. We do not use language or images that stereotype, degrade, or shame children, young people or vulnerable person.

c) **Privacy**: ComSec upholds every child, young person’s and vulnerable adult’s right to privacy. The sharing of information is kept to the minimal necessary to achieve wider goals, and we never share information that could put an individual at risk.
10.2 We keep children and youth safe in our communications by following these guidelines:

a) When using content created by children, young people and vulnerable person, we share the right to use it with the partner involved provided we have received any necessary consents to do so.

b) Where children, young people and vulnerable persons are survivors of violence or human rights violations, both the child/youth/vulnerable persons (and their parent/guardian/carer) and the ComSec partner must give informed consent to their story being told.

c) Consent must be obtained before taking photographs of children, young people or vulnerable person and for images to be used on social media, in recognition of the specific risks associated with posting imagery on the internet. Consent via a partner is acceptable if the partner has consent for images to be taken from participants and/or their parents/guardians.

d) All content, publications, and presentations featuring children, young people or vulnerable persons are reviewed by a senior member of the Communications team, to ensure that no child, youth or vulnerable person is put at risk. Where doubts exist, content decisions will be discussed with the DSL.

e) Images that could be considered sexually provocative or where children, youths or vulnerable persons are not fully clothed are not used.

f) Consent documentation is stored by the communications team.

g) ComSec partners can refuse to participate in marketing activity if this has a safeguarding consequence for their organisation. This will not impact the funding relationship with ComSec, nor will it prevent the partner from being involved in marketing at a later date.

h) If we receive a request to remove a photo from our archives, we will do this promptly.

11. Safeguarding Code of Conduct

11.1 This Safeguarding Code of Conduct outlines the behaviour we expect of all our Senior management, staff, contractors, volunteers and interns, and others visiting ComSec programs or ComSec-supported programs. It aims to help us protect children, young people and vulnerable person from abuse but also serves to protect from allegations of inappropriate conduct. Any breach of this code will be taken seriously and investigated. This may result in disciplinary action (including termination) and/or referrals to relevant authorities such as the police or social services.

11.2 Responsibility

a) Ensure that you have read and follow ComSec policies and procedures at all times.

b) Never engage in any action that harms or exploits children, young people or vulnerable persons.

c) Never engage in illegal activities or use illegal substances.

d) Never behave in ways that are contrary to the values and mission of ComSec or could negatively affect the organisation’s reputation.

e) Report all allegations or suspicions of abuse immediately, using the ComSec reporting procedures outlined at the end of this Policy.
11.3 Rights and Respect

a) Respect differences and never discriminate on the grounds of gender, sexual orientation, culture, race, (including colour, nationality, ethnic or national origin), disability, marital status or civil partnership, pregnancy, maternity, religion or belief.

b) Never act in a way that could be perceived as threatening, including the use of physical punishment or physical force to manage children or youth.

c) Listen to children, youth, and vulnerable persons and take their contributions seriously.

d) Never make sarcastic, insensitive, derogatory, or sexually suggestive comments or gestures.

e) Respect a child, young person, or vulnerable person’s right to personal privacy and use caution when discussing sensitive topics.

11.4 Interactions with Children and Youth

a) Ensure that there is more than one adult present during interactions with children, young people and vulnerable person.

b) Avoid spending excessive time with any one child, youth or vulnerable person or otherwise showing favouritism.

c) Never give money or a gift of any kind to individual children, youths, vulnerable person or their families.

d) Never give a child, youth or vulnerable person your personal contact details or have contact with them via a personal email, phone or social media account.

e) Never take a child, young person or vulnerable person to your home, hotel, or any other private space.

f) Never engage in any form of sexual contact with a child, young person or vulnerable adult. Mistaken belief regarding the age of a child or youth is not a defence.

11.5 Social Media Use

a) Never directly post images or stories about children or youth who are engaged with COMSEC and/or our partners on your personal social media accounts.

b) Never accept contact requests or engage via personal social media with children or youth you have met through COMSEC or our partners, and please report and forward requests to the DSL.

c) Always think twice about what you post/share and what implications this may have for the organisation.

d) Never upload or post any racist, sexist, defamatory, obscene, or abusive content on social media (personal or official ComSec social media pages).

Upholding This Safeguarding Code of Conduct

11.6 If you become aware of any breaches of this code, please follow the procedure below:

a) Report to your direct supervisor.

b) Confidential reports can be made to the DSL.
c) If the breach is not promptly addressed by your direct supervisor, you may escalate to the DSL who may initiate a grievance process in line with the relevant provisions of the Staff Handbook.

11.7A person may report on an anonymous basis, although that may impede the DSL’s ability to investigate the allegations thoroughly. A person preferring to report on an anonymous basis must do so by following ComSec’s Whistleblowing policy and procedures.

12. Reporting and Response Procedures

12.1 It is the responsibility of all to take seriously any concerns, complaints, allegations, suspicions, or incidents involving children, youth and vulnerable persons. Reporting these concerns to the DSL is a ComSec mandatory requirement. Failure to report will be considered a serious breach of ComSec’s Safeguarding Policy and could result in disciplinary action or termination of contract. There will be no retaliation of any sort against any ComSec personnel reporting in good faith in accordance with the policies of the ComSec in effect from time to time.

Please follow the ComSec reporting and response Flowchart in Annex 2.

COMSEC Internal Safeguarding Procedures

12.2 Concerns about harm or abuse must be internally reported where:
   a) You observe concerning behaviour/abuse to a child, young person or vulnerable adult.
   b) The alleged perpetrator is a COMSEC staff member, visitor, contractor, consultant, volunteer, Board member, trustee, Intern or associate, or a member of the staff of a partner organisation.
   c) The alleged perpetrator is a member of the child’s family or community, or is unknown to the child, young person or vulnerable adult.
   d) The alleged perpetrator is also a child, young person or vulnerable adult, although responses should take into account the protection and safety of both the victim and the alleged abuser.
   e) The abuse is historical. The risks of harm to children or youth may persist and require investigation.

Duty of Care

12.3 ComSec has a responsibility to respond to cases of harm and abuse when these are identified through our engagement with children, young people, or vulnerable persons. We must not, however, initiate interventions or offer advice that requires specialist child protection expertise, as this is outside our area of competence and could inadvertently result in further harm to the child.

12.4 ComSec understands the need to make decisions that are appropriate and effective in the local context and take into account local laws, culture, etc. Generally, the local partner organisation will take the lead in decision-making, following their safeguarding procedures, unless it is a concern about the partner, in which case local expertise/advice may be sought via ComSec contacts/network.

12.5 Managing Disclosures
ComSec staff may find they are the recipient of a disclosure by a child or a partner in the field. These bullet points should offer some direction in how to receive this disclosure safely and appropriately and follow the correct next steps:

- Is the child, young person or vulnerable person safe? If not, how can we ensure their safety?
- Reread this Safeguarding Policy.
- Think about what you might say/do and how you might present before it happens.
- Try to be available to be spoken to. The child/youth/vulnerable person may not be ready when you are.
- Listen carefully without interrupting. When it is appropriate, ask questions to clarify the allegation, but remember you are there to clarify facts, not to conduct an investigation.
- Take any disclosures seriously, even if you cannot see any injury that would support the story.
- Be sensitive—arrange a safe and private environment.
- Stay calm—don’t show shock or horror.
- Be reassuring—tell the child/youth that they were right to tell and have done nothing wrong.
- Be responsive—acknowledge how difficult it was for the child/youth/vulnerable person to tell, explain what needs to happen next.
- Be honest—don’t make promises that you can’t keep.
- Be supportive—put arrangements in place for initial support.
- Don’t promise confidentiality.
- Don’t delay action in response to a disclosure.
- Don’t be afraid of being wrong or be concerned about starting an investigation.
- Don’t pre-judge what you are told or make assumptions.
- Before taking any further action, immediately contact the DSL or, if unavailable, your supervisor to discuss next steps. They will work with you to decide who should be informed in the child’s network.
- At the earliest opportunity, make a written record.

12.6 Concerns involving COMSEC staff, consultants and volunteers

- DSL to be informed immediately.
- DSL informs the Safeguarding team.
- If the alleged perpetrator is a staff member the grievance process outlined in the Staff Handbook will be followed.
- Where the individual is a UK national or resident, the DSL reports the matter to the Local Authority Designated Office (LADO) in the area where they live in the UK if appropriate. This is in addition to any official in-country reporting.
Annex 1 - Definitions

**Definitions:**

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Child</td>
<td>In keeping with the United Nations Convention on the Rights of the Child (UNCRC Article 1), <em>a child is any human being under the age of 18 years.</em></td>
</tr>
<tr>
<td>Abuse</td>
<td>All forms of physical abuse, emotional ill-treatment, sexual abuse and exploitation, neglect or negligent treatment, commercial or other exploitation and includes any action that results in actual or potential harm.</td>
</tr>
<tr>
<td>Youth/Young Person</td>
<td>In line with the UN definitions, include individuals – young women, young men, and young persons of other gender identities – aged 15-24 years old.</td>
</tr>
<tr>
<td>Harm</td>
<td>Any detrimental effect on a child’s or young person’s physical, psychological, or emotion wellbeing. Harm may be caused by abuse or exploitation whether intended or unintended.</td>
</tr>
</tbody>
</table>
| Safeguarding          | Refers to all of the actions that are taken to keep all children, young people and vulnerable persons that ComSec, its staff, contractors, volunteers etc come into contact with safe—and includes the proactive measures put in place to ensure children do not come to harm as a result of any direct or indirect contact with ComSec. Safeguarding means:  
  • Protecting children, young people and vulnerable persons from abuse and maltreatment  
  • Preventing harm to children, young people and vulnerable persons health or development  
  • Ensuring that children, young people and vulnerable persons are provided with safe and effective care  
  • Taking action to enable all children, young people and vulnerable persons to have the best outcomes¹ |

region in which we operate and that local context will be considered when making safeguarding decisions.

<table>
<thead>
<tr>
<th><strong>Direct contact</strong></th>
<th>Refers to face to face contact with children, young people and vulnerable persons</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Indirect contact</strong></td>
<td>Refers to contact with children, young people or vulnerable persons online through their data—including images of a child and text posted by a child, young person or vulnerable person—and contact via a third party</td>
</tr>
<tr>
<td><strong>Gender responsive safeguarding</strong></td>
<td>Is a safeguarding approach that:</td>
</tr>
<tr>
<td></td>
<td>- Takes full account of gender in considering the specific needs of girls, boys and other gender identities,</td>
</tr>
<tr>
<td></td>
<td>- Integrates safeguarding measures that address protection risks for children, young people (girls, boys, young women, young men, and children of other gender identities), and vulnerable people that stem from issues relating to gender bias and discrimination; and</td>
</tr>
<tr>
<td></td>
<td>- Supports the empowerment and fosters the inclusion of girls, particularly in the safeguarding process, in a manner that promotes equality, equity and ultimately their increased safety and protection</td>
</tr>
<tr>
<td><strong>Vulnerable persons</strong></td>
<td>A vulnerable person is any person who for whatever reason is unable to take care of, and protect, him or herself from significant harm or exploitation. This could be due to <em>inter alia</em> reasons of mental or physical disability or illness, social status, age, religious beliefs, sexual orientation and gender identity. As people’s identities are shaped by multiple factors at the same time, one may be vulnerable on more than one grounds.</td>
</tr>
<tr>
<td><strong>Staff</strong></td>
<td>Anyone who works for ComSec in a full-time or part-time basis.</td>
</tr>
<tr>
<td><strong>Volunteer</strong></td>
<td>Anyone working for ComSec (full-time or part-time) and are not paid.</td>
</tr>
<tr>
<td><strong>Intern</strong></td>
<td>A student or trainee who works at ComSec for the purpose of gaining work <em>(with or without payment)</em> experience or to certify academic requirement.</td>
</tr>
<tr>
<td><strong>Contractors and consultants</strong></td>
<td>Individuals or groups temporarily engaged by ComSec to offer diverse services such as photography, supplies, consumable and non-consumable materials. It can also include offering professional services such as research, documentation, training, evaluation etc.</td>
</tr>
</tbody>
</table>
ANNEX 2 – Reporting and Response Flowchart

1. Listen and confirm facts
   - Concern arises or complaint made
     - Report to DSL
       - Is there a child in immediate danger?
         - Yes
           - Call Police/relevant authorities
         - No
           - Is the concern regarding the behaviour of ComSec staff, consultants, partners etc.?
             - Yes
               - Report to DSL or Make Whistleblowing complaint
             - No
               - Does the concern need reporting to local/national authorities?
                 - Yes
                   - Is the concern due to the way ComSec is delivering business?
                     - Yes
                       - Report to authorities
                     - No
                       - Does the concern need reporting to local/national authorities?
                         - Yes
                           - Report to authorities
                         - No
                           - Decide further response, record case and action taken
     - No
       - Does the concern need reporting to local/national authorities?
         - Yes
           - Report to authorities
         - No
           - Follow up on action taken by authorities
2. Apply internal safeguarding procedures