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JUMPSTARTING SAFEGUARDING: A CASE STUDY

TRICKLE UP'S EXPERIENCE IMPLEMENTING AND OPERATIONALIZING PSEA
POLICY AND PROCEDURES



ABOUT TRICKLE UP

Trickle Up is a small NGO comprised of a team of about 60 individuals. Since 1979, Trickle Up's mission has continuously been a commitment to work with individuals worldwide to support them in their efforts to transition out of extreme poverty. To do so, Trickle Up provides individuals, primarily women, living in extreme poverty with seed capital grants, skills training and coaching, and the support they need to create small businesses. To drive large-scale change, Trickle-Up also partners with governments, global institutions, and local organizations. To date, Trickle-Up has helped 1.5 million of the world's poorest individuals move towards greater economic self-sufficiency.

Trickle-Up has reached 335,000 participants in the Americas, Sub-Saharan Africa, and Asia. Initiatives range from providing economic opportunity for young women and girls accompanied by reproductive health intervention in Guatemala to promoting sustainable livelihoods for ultra-poor households in India working alongside state government systems. Trickle Up also works across a range of western African sub-Saharan countries to build government and community workers' capacities to effectively train and coach program participants in village saving and loan groups.

HOW TO USE THIS CASE STUDY

The case study focuses on Trickle Up's experience developing and implementing safeguarding practices throughout the organization. Trickle Up is a small NGO—with a US-based staff of less than 25 and a global staff of 60—with a limited budget for safeguarding. As such, this case study is intended to give small and medium organizations with significant budgetary constraints safeguarding tips on actionable steps that can be taken to make progress on safeguarding. Please note: at Trickle Up, the Programs Operations Advisor works as the safeguarding lead.

WRITING AND FINALIZING A PSEA POLICY

BACKGROUND

Trickle Up signed InterAction's [CEO Pledge on Preventing Sexual Abuse, Exploitation, and Harassment](#) (PSEA) in the fall of 2018. At the time, Trickle-Up had a draft PSEA policy that it had not yet operationalized. After signing the CEO Pledge, Trickle Up's Program Operations Advisor and management identified the need to develop and write a new PSEA policy for Trickle Up to fulfill its commitments to the CEO Pledge.

HOW DID TRICKLE UP CREATE ITS PSEA POLICY?



Network with peer organizations.

Trickle Up's Programs Operations Advisor conducted targeted outreach to other organizations that had signed the CEO Pledge based on their size, geographical location, and scope of work. This helped her understand what similar organizations were doing to address PSEA before drafting Trickle Up's new policy and procedures. Aside from policies from similar organizations, she relied on InterAction's [course materials on preventing sexual exploitation and abuse](#) to educate herself about safeguarding policies.



Seek approval from all levels of the organization.

After Trickle Up's Programs Operations Advisor drafted the initial policy and procedures, it was cleared internally with various members of Trickle Up's New York City headquarters team. It was also sent to the three field office teams in India, Guatemala and Uganda so that local staff could confirm that the steps laid out in the policy were logistically feasible. Following clearance, a representative from Trickle Up's board reviewed and commented on the policy and procedures.



Ask for outside review.

The draft PSEA policy and procedures were then taken to peer organizations to read and review, which allowed organizations with safeguarding experience the opportunity to weigh-in. Finally, the PSEA policy and procedures were taken to Trickle Up's pro bono legal counsel for a final review and feedback. The entire process took four months.

KEY TIPS FOR JUMPSTARTING SAFEGUARDING:

- Be honest about how much staff time you can commit to safeguarding. This is a significant indirect expense!
- Safeguarding leads and management should communicate clearly from the start about how involved management can be in the process.
- Communicate with staff at every level about their honest ability to implement policies and procedures.
- Simplify! Staff will be more likely to read a one-page policy than a ten page policy.

HIRING MECHANISMS AND ONBOARDING

TRICKLE UP HAS MADE SEVERAL CHANGES TO THE HIRING AND ONBOARDING PROCESS WITH THE ONLY EXPENSE BEING STAFF TIME.



CEO Video on policies for new hires.

At the time of hiring, all staff are now sent the PSEA policy and procedures and an explanatory video featuring Trickle Up's CEO, William A. Abrams, in which he explains that Trickle-Up's PSEA policy, among other policies, are integral to its mission and that it is essential that all Trickle-Up staff uphold its safeguarding principles. Trickle Up's Program Operations Advisor wrote the video script, which was filmed by the communications team.



Knowledge quiz.

After reading the PSEA policy and procedures, all new hires must complete a knowledge quiz to check their understanding of Trickle Up's safeguarding principles.



Background checks for US-based staff.

Prior to signing the CEO Pledge, Trickle-Up conducted background checks for all financing and accounting staff in the U.S. Now, to prevent the hiring of individuals with a history of sexual misconduct, Trickle-Up conducts background checks of all US-based staff. This had to be integrated into Trickle Up's yearly budget, as there is no "low-cost" way to do adequate background checks. Due to budgetary constraints and the potential lack of sufficient information to conduct background checks outside of the U.S., this procedure has not yet been implemented at offices abroad.

HIRING MECHANISM AND ONBOARDING: LESSONS LEARNED

- Making changes to hiring mechanisms is costly. Trickle Up had to make room in its budget for background checks for U.S. staff. Budgetary constraints are the main barrier to instituting background checks at offices abroad.
- Making changes to onboarding is possible by only using staff-time.
- Use existing infrastructure for onboarding changes! Trickle Up used Microsoft Forms for the knowledge quiz and existing video equipment for the CEO video.

INVESTIGATIONS AND RESPONSE

BACKGROUND

After signing the CEO Pledge, Trickle-Up researched ways it could implement an investigation process for PSEA complaints. Due to budgetary constraints, it was not feasible to hire an outside investigator to be on retainer—the entire investigation process was designed with this limitation in mind.

TRICKLE UP'S INVESTIGATION PROCEDURE IS AS FOLLOWS:



All complaints are referred to a three-person internal team.

All staff have access to an online complaint system. If a staff member feels something has occurred that runs counter to Trickle Up's safeguarding policy, they fill out a Microsoft Forms form describing the complaint, which goes directly to Trickle Up's Director of Programs. The Director of Programs is obligated to consult an internal team consisting of herself and two other members of Trickle-Up's leadership. Within 72 hours, they are to decide whether the complaint is material.



If the complaint is material, it is referred either to the outside investigatory body or outside legal counsel, as applicable.

The individuals who make up the investigatory body are entirely external to Trickle-Up, have limited to no relationship with Trickle Up's leadership, and have backgrounds in safeguarding. This investigatory body serves for a five-year term and cannot work for Trickle-Up in any manner during that time.



Trickle Up's outside legal counsel is available to weigh in.

This is true for both the three-person internal team and the outside investigatory body.

WHO MAKES UP THE EXTERNAL INVESTIGATORY BODY?

- All members of the external investigatory body serve in a volunteer capacity. A [significant amount of staff time](#) had to be allotted to recruiting the external investigatory body as Trickle Up wanted to ensure that they were as far removed as possible from the organization.

KEY TAKEAWAYS

HOW CAN ORGANIZATIONS WITH LIMITED BUDGETS MAKE PROGRESS ON SAFEGUARDING?

- **Be honest about time and resources you can devote to safeguarding:** although most of these changes only require staff-time, this can add to a significant indirect expense. Do an honest appraisal at the start of your process to define what you can afford to do.

- **Utilize existing infrastructure:** Trickle Up was able to easily create a staff complaint form using Microsoft Forms, and the communications team was able to produce their introduction to PSEA video using existing materials. Organizations facing similar budgetary constraints may find that they are able to make more progress than they expected by using free materials.

- **Keep it simple:** Trickle-Up has found that by intentionally simplifying aspects of their PSEA work, it is more accessible to staff. For example, Trickle-Up’s PSEA policy is relatively short, which makes it more likely that staff will read it. Additionally, the Program Operations Advisor’s “safeguarding 101” email blasts are only intended to take 15

DOWN A RABBIT HOLE

- At the start of this process, Trickle Up’s Programs Operations Advisor often found herself hitting dead ends on ideas for safeguarding. She had originally conceptualized a hotline for a reporting system, only to realize that it was out of budget. Similarly, she researched many types of software that could be used that ended up being out of Trickle Up’s price range.
- Do a thorough review of existing materials that can be utilized at the start of the process—you will thank yourself later!

SUSTAINING A COMMITMENT TO PSEA: SAFEGUARDING 101 SERIES

- Trickle-Up has begun an ongoing education campaign to keep staff continuously engaged on PSEA policies. To do so, Trickle Up’s Program Operations Advisor sends out an “safeguarding 101” email to all members of staff highlighting a section of the PSEA policy and another resource, such as an explanation of how to use the “report abuse” function on Trickle Up’s website, that compliments it. The President and Board have also committed to reviewing and making any necessary changes to the PSEA policy once per year.

minutes of staff time. This helps ensure that staff will devote time to reading these resources, rather than skimming over them.



ABOUT INTERACTION

InterAction is a convener, thought leader, and voice for nearly 200 NGOs working to eliminate extreme poverty, strengthen human rights and citizen participation, safeguard a sustainable planet, promote peace, and ensure dignity for all people.