

TRICKLE UP

Low and No-Cost Safeguarding Measures for Small NonProfits: A Manual

INTRODUCTION AND BACKGROUND

Trickle Up has committed to taking steps to protect its staff and the communities it serves from sexual exploitation and abuse, and to improving its safeguarding practices. For Trickle Up, this commitment was solidified in the fall of 2018 when we became a signatory to the InterAction CEO Pledge on Preventing Sexual Abuse, Exploitation, and Harassment by and of NGO Staff, which is available [here](#).

Upon signing the pledge, Trickle Up designated staff time to pursuing a safeguarding program. However, due to the small size of Trickle Up, the budget remained limited. Trickle Up therefore began designing a plan to take safeguarding measures on a small budget. In the fall of 2019, Trickle Up received a Piloting Solutions grant of \$20,000 from InterAction to continue to build a low-cost safeguarding program, train staff in person, and share lessons learned with other non-profits. “Low and No-Cost Safeguarding Measures for Small NonProfits: A Manual” is the result of two years of initiatives and lessons learned, combined with grant support from InterAction.

ABOUT TRICKLE UP

Trickle Up helps people in extreme poverty and vulnerability advance their economic and social well-being. We drive large-scale change by partnering with governments, global institutions, and local organizations. Trickle Up has been a pioneer graduating people out of extreme poverty since 1979. We’ve helped more than 1.5 million of the poorest and most vulnerable people move to greater economic self-sufficiency and connection with their communities.

We provide the very poorest people with seed capital grants, skills training and coaching, and the support they need to create small businesses. We connect them to savings groups where they save money and access credit with others, create plans for the future and enact change in their communities. We help people connect with others in their villages, build self-confidence and find their voice because poverty is about more than just money—it’s about exclusion.

Trickle Up reaches the extreme poor, those living on less than \$1.90 a day, who are most economically and socially excluded. Our focus is helping women, people with disabilities, refugees and other vulnerable people who live beyond the reach of most organizations and social service programs. We go where the need is greatest—to the very poorest parts of rural Asia, Africa, and the Americas.

We’re committed to the global goal to eradicate extreme poverty by 2030. Our goal in the next five years is to lift more than a million people out of extreme poverty. To make it happen, we are establishing partnerships with local organizations, global institutions and governments who have the capacity to reach far more of the poorest than we could ever reach working on our own.

SAFEGUARDING STEPS SMALL NON-PROFITS CAN TAKE

1. Creating Policies:

a. Self-education:

One of the first steps in creating a safeguarding program (which likely includes a Protection from Sexual Exploitation and Abuse (PSEA) Policy and PSEA Procedures) is self-education about what these programs look like and mean for other non-profits.

Major sources for this information are the websites of other non-profits. Many non-profits have either “safeguarding” sections on their websites or “policy and procedure” sections on their websites, wherein you can often download copies of organizations’ policies and procedures in full, for free. An important step at the beginning of this process is to make sure you understand state and local guidelines for sexual harassment compliance, and how that differs from safeguarding and PSEA Policy and Procedure. A good starter recourse for sexual harassment in the workplace can be found [here](#).

In framing your organization’s PSEA Policy and Procedure and other safeguarding documents, it is likely most helpful to start by looking at the websites of the organizations most comparable to your own. If comparable organizations have not posted this information, it may then be a good idea to branch out to the websites of larger organizations or to organizations that perform different functions within the non-profit world. One example of a comprehensive PSEA Policy is USAID’s Policy, which is available [here](#). It is important to keep in mind that larger organizations often have bigger budgets for safeguarding, and therefore, the frameworks set forth in these policies will in many ways be difficult for small organizations to replicate.

Some organizations may not post this information publicly on their websites, but if you have a contact at a certain organization (especially if it is comparable to your own in terms of size or scope of work), you may consider reaching out directly and asking if that organization can share its documents for the purpose of education.

To get a good sense of how these safeguarding documents function, it is advisable that you read, in detail, as many PSEA Policy and Procedure sample documents as you can. The amount of time your staff have to dedicate to this will likely determine how many you are able to read for reference, but fifteen (15) is a good goal, and will likely give you enough of a background that you understand how others address this issue.

Another important tool for self-education is reading articles and other references that advise on safeguarding policies. Below is a list of suggested resources that can be used to start:

- [20 Core Elements: A Toolkit to Strengthen Safeguarding Report-Handling](#)
- [Checklist: Essential Safeguarding Steps to Protect Your Community](#)
- [CHS Alliance PSEA Implementation Quick Reference Handbook](#)
- [IASC: Six Core Principles Relating to Sexual Exploitation and Abuse](#)
- [Sexual Abuse Prevention Practices for Non-profit Organizations](#)
- [What Topics Should a Solid Safeguarding Policy Address?](#)
- [UN: Preventing Sexual Exploitation and Abuse](#)

b. Education from Peer Organizations

Another important free source of information and education is organizational peers. Look to contacts that you have made in safeguarding meetings or trainings, or contact organizations whose PSEA Policies and Procedures are well thought out or similar to your own. Then seek peer review, discussion, and comment on your draft PSEA Policy and Procedures.

c. The Writing and Review Process

The best models for PSEA Policy and Procedure will be clear and to the point, and will include a list of defined safeguarding terms.

If you have someone on your team who has a background in writing policies, safeguarding, compliance, or law, that person is likely a strong candidate to begin drafting your PSEA Policy and Procedure. You may also want to

consider whether you have a board member who is the best candidate for this task.

Another option is to hire a consultant to draft safeguarding documents for your organization, and while he or she will likely bring a lot of experience to the table, this will be more expensive for your organization. Keep in mind that no matter who you choose to draft these documents, the person will need to have a good understanding of how your organization actually works, and that drafting safeguarding documents that will have practical functionality for your organization is important.

After an initial draft is formed (and depending on how your organization best functions), you can determine whether additional staff members have the time and expertise to comment on the PSEA Policy and Procedures drafts. This can help refine the documents and ensure they will function well for your organization. It will also ensure there is staff buy-in and recognition of the organization's commitment to safeguarding, and does not cost anything other than staff time. If your organization works in multiple countries, it is important for policies to be reviewed by a staff member in each country office to ensure the documents comply with and complement local laws.

For some organizations, final drafts of policies and procedures will need to be translated into other languages, depending on staff and beneficiary needs. Translation fees can be costly. One option is to seek out non-for-profit translation organizations to see if your project qualifies for their services. Often this is a long-lead time project, so be aware of timelines. If you are working on a translation for a field office, getting field office staff input on local translators can assist in keeping translation fees low. Another translation option that may be workable depending on the situation is to seek out an intern's assistance with the project if you are able to find an intern with the correct language skills. Keep in mind that all procedures, forms, and related quizzes and onboarding materials will likely need to be translated as well.

2. Creating Procedures:

Instituting procedures to ensure your organization's PSEA Policy functions to receive and address safeguarding complaints, gather feedback, implement training, and make staff aware of safeguarding goals is an important part of creating a working

safeguarding system. However, for small non-profit organizations with limited budgets for this work, it is imperative that you are able to implement procedures without stretching your safeguarding budget too much.

Therefore, an important first step is to learn about the functionality of all your existing software systems to determine how they can be used to implement your PSEA procedures.

If you already have other policies in place and use software for staff training, onboarding, knowledge quizzes, or complaints, it is advisable that you first seek to build out a PSEA Procedure framework using what you already have. That way, these procedures for various organizational policies will all “live” in one place and will be streamlined.

a. Microsoft Forms:

Many organizations use Microsoft software. Though this Manual typically aims to provide general advice that can be applied to a wide variety of situations, the commonality of Microsoft usage means that addressing this specific software may be useful.

Microsoft has a “forms” system wherein a user can create various forms and quizzes. A user simply goes to <https://forms.office.com/> to begin creating a form. This Microsoft Forms [support page](#) is helpful to learn about the system and its functionality. It is likely that some kind of form system will be helpful in building out a non-profit’s safeguarding procedures, as a standard aspect of most all PSEA Policy and Procedure systems is the ability for a person to make a complaint about a safeguarding incident that has occurred, and to alert a representative of the organization. Microsoft Forms enables this to occur anonymously if anonymous settings are selected. An organization can choose whether its Microsoft Forms complaint system is available to just its staff (likely by posting links to the Forms system on its intranet), or to staff and partners (by posting a link in a place where staff and partners have access), to staff, partners, and beneficiaries (by posting a link in a place where all three groups have access), or to the general public (likely by placing a link on the organization’s website homepage).

b. Staff Onboarding

Ensuring that new staff read, understand, and use an organization's PSEA Policy and Procedures is important. Having this occur on a limited budget is most likely to be accomplished by using existing software, as discussed above. If an organization already has an onboarding point person who familiarizes new staff with other policies and procedures, it is likely that the PSEA Policy and Procedure can be added to the list with little time and effort.

If the organization has decided to use Microsoft Forms for its complaints system, it is very easy to also use Forms to have each staff person sign off on reading and receiving the PSEA Policy and Procedure. Simply create a Microsoft Form that allows each staff person's name to be filled out after a certification that the person has read and reviewed the materials.

In addition, an idea in regard to safeguarding onboarding that is advisable is for each staff person to take a knowledge quiz demonstrating that they have understood the safeguarding material presented in the organization's PSEA Policy and Procedures. This knowledge quiz can be created for free using either Microsoft Forms or one of many free quiz software choices, such as Survey Monkey. One staff member's time will be used in creating and administering the quiz, but that is likely the only cost.

An additional option for more safeguarding information transmission during onboarding is creation of a brief video explaining your organization's policy. The idea behind the video is to present the same information as is contained in the PSEA Policy and Procedures, but in an altered format to appeal to various staff learning styles. Of course, larger organizations or organizations with significant budgets may choose to hire a media company to produce a video like this, but the process can also likely be completed in-house for very little cost.

To accomplish onboarding video-making for little or no money, determine if a staff member with camera expertise (perhaps a member of the communications team, if such team exists) can film another staff member as he or she explains the basics of the PSEA Policy and Procedure. A staff member with the most knowledge of the PSEA Policy or Procedure (likely the author of such) can write the script, and either that person or a member of your organization's management can present the material in a straightforward format. The video can "live" online, and does not need to be saved onto physical DVDs or printed, which would incur additional cost.

c. Hiring Policies and Background Checks

One aspect of the InterAction CEO Pledge on Preventing Sexual Abuse, Exploitation, and Harassment by and of NGO Staff (mentioned above in the introduction) is the prevention of re-employment of perpetrators within the sector. Non-profit organizations are currently determining if there is a way to work together to increase transparency on this issue.

However, for the immediate future, a main way to prevent the rehiring of perpetrators is to conduct background checks on potential employees. After extensive research, we determined that this is unlikely to be done well for free (at least currently). Therefore, this is an area where it may be worthwhile to spend money from a limited budget to hire a third party to conduct such checks.

3. Culture Change Initiatives

a. Leadership Buy-In

Getting an organization's management behind safeguarding initiatives is an important way to prioritize safeguarding, change an organization's culture, and demonstrate to staff that safeguarding is important to the organization. Simply adding safeguarding topics to regular management meetings means that safeguarding can become part of the organization's list of topics that require ongoing attention and monitoring.

Leadership should spend time considering how and when to communicate new safeguarding initiatives to the board. Leadership should also, with the help of the staff dedicated to safeguarding, discuss how the organization will approach transparent reporting of any PSEA complaints. Is there a regularly occurring written communication that already goes out to all staff? If there is, perhaps there is a way to begin reporting on the organization's number of PSEA complaints (without revealing sensitive information about the complaint, including personnel involved). Having your staff understand that the safeguarding system is being used and is functioning is key to its continued success.

b. Staff Meeting Time

Prioritizing safeguarding trainings, discussions, and information-sharing during already scheduled staff meeting time is a way to ensure that time is devoted to

safeguarding topics. Over time, this prioritization of safeguarding demonstrates an organization's commitment to it and can begin to change an organization's culture. This can be accomplished either by setting aside a certain portion of staff meetings for safeguarding topics, or for devoting an entire staff meeting to safeguarding on a regular basis.

c. Job Descriptions

To advance staff buy-in to an enhanced safeguarding program, encourage staff to meet and outline the safeguarding responsibilities that are emerging at your organization. Some of these may include lead responsibilities for most safeguarding programming falling to a designated person and certain managers overseeing large portions of your safeguarding plans. However, other staff members will have increased duties as to safeguarding, including human resources or office management staff who will conduct onboarding, accounting staff who will manage budgetary aspects, and communications staff who may be newly responsible for safeguarding portions of the website.

To cement these responsibilities, write them into job descriptions for staff, or conduct a workshop where staff update their own job descriptions to include safeguarding work. The goal is to weave safeguarding into your organization at many levels.

d. 101 Email Blasts

One way to regularly remind an organization's staff about the importance of safeguarding work is to commit to having your safeguarding lead (or a member of management) highlight a safeguarding issue for all staff via a regular email "blast." This means that the email goes out to all staff, takes a didactic tone, and informs everyone of either an aspect of the PSEA Policy or Procedure that may need to be highlighted or of an issue in the news that is relevant to non-profits and safeguarding.

4. Using In-House Expertise

a. Communications Work

If an organization has a communications or marketing team (or even a designated person who manages the website), there are many important

safeguarding initiatives that can be accomplished by this person or team- often at little or no cost other than time.

First, adding a mechanism to the organization's existing website that allows any person with internet access to report abuse or complaints is relatively simple. The organization will need to spend time designing how this function works and discussing which staff person's email should receive complaints or safeguarding feedback.

Second, designing a safeguarding page wherein the organization reports on its safeguarding initiatives and programs is also likely low cost. However, depending on how in-depth the page is, it may require more upfront design time, and a staff person will likely need to be designated to updating the information on a regular basis.

Third, if the organization determines that it is best, the organization's PSEA Policy and Procedures can be uploaded to the website. This enables other organizations to learn about your safeguarding initiatives, and also is another way to demonstrate to staff, partners, the board, and beneficiaries that the organization's safeguarding work is a priority. Uploading these documents takes very little time and can be done at no cost.

b. Building Safeguarding into Programs

To build up safeguarding as a vitally important element of future non-profit work, consider including safeguarding as a line-item in future grant proposals (even those that are not fully designated safeguarding projects). The programs team (or whichever team is most relevant) can meet to discuss how and where this can work, and the fundraising arm of the organization can begin to normalize safeguarding with donors by beginning to educate them about its importance. The only cost involved here is staff time.

c. Board expertise

Another source of potential and free expertise and input to advance safeguarding causes within an organization is that organization's board. Look through your board composition closely to determine if anyone has safeguarding, policy, compliance, communications, or legal background. This board member (or members) may be willing to help write and edit policies and

procedures, attend or lead safeguarding meetings or trainings, draft or produce communications materials, or advance other safeguarding initiatives.

5. Using (Free) Outside Expertise

a. Seek Out Free Training Resources

It is well established that training in PSEA and safeguarding is integral to a successful program for non-profit organizations. Training is needed for staff, partners, board, and beneficiaries. Intensive, customized, in-person trainings are likely the most effective, but unfortunately, these often come at significant cost.

Free training is, however, becoming more widely available as the non-profit sector continues to explore and expand training resources. InterAction has an excellent [Prevention of Sexual Exploitation and Abuse Basics Training Guide](#) and [trainings website](#) that are free.

b. ProBono Counsel

If an organization has access to pro-bono outside counsel, such counsel can be an excellent resource for safeguarding initiatives. Pro bono counsel can assist in advice on safeguarding and sexual harassment compliance issues and can draft and edit PSEA Policy and Procedure documents. If anyone on your pro bono counsel team has specific safeguarding expertise, they may be willing to lead training initiatives.

If your organization does not have a relationship with pro bono counsel, the beginning of a safeguarding initiative may be a good time to start establishing this relationship.

WHERE DO WE GO FROM HERE?

Trickle Up puts this Manual forth with great humility, and in a spirit of desire for continued learning. Over the last two years, we have worked on many safeguarding initiatives that have succeeded for us, but just as many have been missteps that required adjustments. We have not fully implemented one hundred percent of the initiatives described above, but we have implemented the majority of them. We are also continuing to refine safeguarding initiatives that are still so nascent that they do not appear here. Perhaps someday they will appear in a second version.

We welcome the opportunity to share, refine, and edit this Manual with our peers. It is our hope that it can become a better resource if there is group feedback and addition at some point.