

Safeguarding Policy

Last updated: 8 October 2026

1. Introduction

The purpose of this Safeguarding Policy is to set out III Europe's commitment:

- To protecting 'adults at risk', children and young people, including any other vulnerable groups, who might take part in our operations including outreach, workshops, focus groups and interviews, from harm, abuse and exploitation; and
- To provide all persons associated with the functions of III Europe with the overarching principles that guide our approach to safeguarding and child protection.

2. Scope

This policy applies to all III Europe employees, volunteers, interns, contractors, and third-party partners (including implementing partners and subcontractors). It also covers any interactions with partners, external stakeholders, and community members with whom the organisation works.

Everyone who works with or on behalf of III Europe needs to be aware of this policy and must act in accordance with it. This policy does not form part of any contract of employment or contract for services and we may amend it at any time. We publish this Safeguarding Policy on our website and we encourage everyone who comes into contact with us to report any safeguarding concerns to us.

This policy addresses issues related to safeguarding concerns. A safeguarding concern is any allegation or suspicion that someone associated with our work has caused or may be at risk of harm or abuse. Abuse can be difficult to assess and applying this threshold may prevent individuals from reporting. In order to assist our members and associates in identifying safeguarding concerns, we provide a broad overview of the types of harms to be alert to:

- Physical: Any physical contact that results in discomfort, pain or injury
- Emotional/Psychological: Action or inaction that causes mental distress
- Exploitation: Misuse of power or control over another person for financial, social, sexual or other benefit
- Bullying & Harassment: Unwanted behaviour which causes offence, intimidates or humiliates others
- Institutional: Systems or culture within an organisation that can result in any kind of harm or failure to prevent harm through acts of omission
- Sexual Harassment: Unwanted verbal, non-verbal or physical conduct of a sexual nature
- Sexual: Coercion or force to take part in sexual acts of any kind

This list is not exhaustive and any concerns about the safety or welfare of anyone connected with our work, no matter how minor, should be reported to one's direct supervisor or to III Europe's Safeguarding Focal Point.

Please note that instances of sexual harassment and misconduct listed above are discussed further in our separate Sexual Exploitation, Abuse and Harassment (SEAH) policy.

3. Policy statement

Every member or other person associated with or working on behalf of III Europe is committed to treating all adults at risk, children and young people, including vulnerable groups, equally, with dignity and respect regardless of their age, disability, gender identity, marriage or civil partnership, pregnancy or maternity, race, including colour, ethnic or national origins and nationality, religion or belief, sex, or sexual orientation.

4. Commitment to Prevention:

III Europe will seek to keep adults at risk, children and young people, including vulnerable groups, safe from harm, exploitation and abuse by:

- Valuing them, listening to and respecting them;
- Appointing a Safeguarding Focal Point (SFP). The SFP is the main contact person for safeguarding policies, procedures, good practice and guidance. S/he is accountable to all members of III Europe and anyone who might take part in our operations
- Adopting child protection and safeguarding practices through designated procedures and a code of conduct for all members once and if projects involving children, young people or other vulnerable groups have been secured. These would focus on and provide further guidance on informed consent, the concept of 'doing no harm', the importance of voluntary participation throughout the project, and maintaining anonymity and confidentiality;
- Using these safeguarding procedures to share concerns and relevant information with agencies who need to know;
- Recruit staff, contractors, interns and volunteers safely, ensuring all necessary checks are made. This includes obtaining a Dutch Certificate of Conduct (VOG) or an equivalent document from local authorities, for all staff and Board members and may also include conducting a reference check for new hires.
- Ensure existing individuals associated with III Europe dedicated to a particular project involving children, young people or other vulnerable groups receive adequate training as needed;
- Recording and storing information professionally and securely as per III Europe's Privacy Policy;
- Using III Europe's existing Grievance and Complaints Policy to manage any allegations against any action or anyone associated with the functions of or anyone working on behalf of III Europe.

Protecting people is everyone's responsibility.

Board

III Europe' Board is ultimately responsible for safeguarding and for ensuring that staff and volunteers are competent to carry out their safeguarding responsibilities. The Board will take action to avoid any actual or potential conflicts of interest which could lead to III Europe being compromised in any way in enforcing our safeguarding commitments.

The Board will review safeguarding reports that are raised to them and decide whether to report a serious incident to the police.

The Board will review this Safeguarding Policy annually or (if sooner) when there are any material changes to safeguarding legislation or guidance, and in light of any safeguarding reports.

Managing Director

The Managing Director will work to:

- ensure that everyone working for or on behalf of III Europe is made aware of this Safeguarding Policy
- ensure that III Europe follows safe recruitment practices that are appropriate to the role and the level of risk
- promote a culture of listening to people and encouraging people to speak up
- ensure safeguarding concerns are investigated appropriately and in line with this policy
- maintain a record of all safeguarding incidents, concerns, reports and referrals
- liaise with external stakeholders on safeguarding issues, where appropriate

Staff, consultants, interns, and volunteers

Everyone who works for or on behalf of III Europe shares responsibility for protecting people who come into contact with the organisation from harm resulting from that contact.

You must:

- familiarise yourself with this Safeguarding Policy and follow it in your work with III Europe
- report any safeguarding concerns or suspicions (for the avoidance of doubt, there is no obligation on an individual to report any incident that has happened to them)
- co-operate with any safeguarding investigation

Staff who carry out fundraising activities on behalf of III Europe must:

- comply with our anti-bribery and corruption policy when fundraising
- never exploit vulnerability when carrying out fundraising activities
- take all reasonable steps to ensure that individual donors make informed decisions about any support they choose to give to III Europe

5. Reporting and Complaint Mechanisms

We are committed to maintaining accessible and effective reporting and complaint mechanisms for both internal and external parties. This includes:

- Internal Reporting Channels: All employees and volunteers are encouraged to report any safeguarding suspicion or incident through confidential and secure reporting tools available within the organisation, including anonymous options where feasible.
 - If a volunteer, intern, consultant or staff member has a safeguarding concern, they should first discuss this with their direct supervisor
 - If a volunteer, intern, consultant or staff member has a concern involving their direct supervisor, the matter should be discussed with any member of the Board. This may be the Chair or any other member trusted by the person making the complaint.
 - If a member of the Board has a concern, they should discuss this with the Chair or any other member of the Board trusted by the person making the complaint.
 - If the matter is not resolved in the above procedure, the concern should be raised in writing to the Board. This will require a special meeting of the Board. It will be dealt with within fourteen days and treated in a confidential manner.
- External Reporting Channels: We provide accessible, confidential, and secure mechanisms for external partners to report any safeguarding incidents.
 - If an external partner has a concern involving any member of III Europe or the organisation in general, they should contact III Europe's Managing Director Sophie Kloos (sophie.kloos@iiieurope.org).
 - If their concern involves the Managing Director, they should discuss it with the Safeguarding Focal Point, Mette Honoré, at Report.misconduct.IIIEUR@safestandards.dk.
- Protection from Retaliation: We provide protection to anyone who reports a genuine concern under this procedure against negative repercussions as a result of raising this concern.

6. Making a Safeguarding Report

- If you witness a safeguarding incident, or if an incident has just taken place, and you believe someone is at imminent risk of significant harm, you should call the emergency services and then report the matter following the process above.
- If you have a concern that someone may be experiencing, has experienced, or is at risk of experiencing abuse or exploitation you should make a report to the relevant contact (see below) without delay. You should report a safeguarding concern, even if it relates to an incident that occurred some time ago.
- When you make a report, it is helpful if you can provide details of your concerns including:
 - the name(s) of the people involved
 - a description of each incident
 - the dates, times and location of each incident

7. Response and Action

All safeguarding reports will be addressed professionally, promptly, and in a manner that respects the dignity and rights of all involved.

- Response: Safeguarding reports may reach III Europe through various routes, including telephone calls, text message, social media, face-to-face discussions, or rumours. All concerns must be taken seriously.
- If someone raises a safeguarding concern with you, you should:
 - listen
 - empathise with the person making the report
 - ask who, when, where, what, but not why
 - repeat what you have been told to check your understanding
 - reassure the person making the report that III Europe will treat all SEAH reports as confidential and that information will only be shared on a strictly 'need to know' basis
 - do not promise secrecy – if someone is in danger you will have to inform others
 - if the person making the report is a member of staff, ask them to limit discussions about the matter with other colleagues as far as possible in order to allow III Europe to respond to their concern in line with this policy
 - (if the person receiving the report is not the Safeguarding Focal Point) make a report to the Safeguarding Focal Point without delay.
 - You must keep safeguarding reports confidential. Members of staff who breach confidentiality will be subject to disciplinary action up to and including termination of employment.
- Immediate Action: The Safeguarding Focal Point will consider the report and will make a decision about how to take the matter forward. Reports will be acknowledged and acted upon within a clear and defined timeframe. Initial risk assessments will be conducted to protect the safety of victims, survivors, and others involved. The risk assessment will take into consideration:
 - any risk of further harm to those affected by the alleged incident or incidents
 - whether those affected want the matter to be reported externally
 - whether external reporting risks disproportionate consequences for the accused
 - whether due process is guaranteed or likely (for example, where the incident occurs overseas).
- Investigations: Formal investigations will be initiated for all credible reports, following procedures that ensure confidentiality, fairness, and impartiality.
- Sanctions and Disciplinary Measures: Appropriate actions, including disciplinary measures, will be taken against those found responsible for safeguarding, up to and including termination of contracts or partnerships.
- Reporting to the Board: The Safeguarding Focal Point will inform the Board that a safeguarding report has been received and the Board will be responsible for deciding whether the matter should be reported as a serious incident to the relevant bodies in the appropriate jurisdiction. The Board may delegate authority to make a report to a staff member or external agent (for example, a lawyer). Unless a case is particularly serious, details of safeguarding concerns will not be shared with the full Board. The board will only receive reports summarising the nature of issues raised and the outcomes.

- Referrals to External Agencies: Where appropriate, III Europe will refer safeguarding concerns to appropriate external agencies such as:
 - municipalities
 - law enforcement authorities for criminal investigation
 - children's social care services
 - other relevant bodies in the Netherlands or another relevant jurisdiction

Where applicable, the Safeguarding Focal Point and Managing Director may decide to provide a limited description of safeguarding allegations, incidents or concerns to institutional donors and other third parties (for example, III Europe' insurers).

8. Victim/Survivor-Centred Approach

III Europe adopts a person-led approach to safeguarding, and the safety and wellbeing of complainants and survivors is paramount. We are committed to learning and evolving our practices to support victims and survivors, with particular attention to:

- Continuous improvement: We actively seek feedback from complainants and survivors, if and wherever appropriate, in order to improve our safeguarding policies and processes
- Taking a victim/survivor-centred approach: All decisions on support will be led by the individual.
- Confidentiality: III Europe will treat all safeguarding reports as confidential and information will only be shared on a strictly 'need to know' basis, to ensure victims/survivors' privacy. This may include sharing information with line managers and/or Board members.
- Support Services: We ensure access to appropriate psychosocial, medical, and legal support for victims and survivors, based on their needs and wishes.
- Empowerment: Victims/survivors are treated with dignity, and their choices regarding how to proceed are respected throughout the process.

9. Responsibility for Implementing Partners and Subcontractors

III Europe recognises the importance of holding our implementing partners and subcontractors to the same high standards regarding safeguarding. Therefore:

- Contractual Agreements: III Europe will ensure that agreements or contracts with third-party groups or organisations which involve contact with children or adults at risk include an obligation on the partner to have appropriate safeguarding policies and procedures in place and comply with its statutory and regulatory safeguarding obligations. The agreement or contract will also clearly outline safeguarding procedures including:
 - who has overall responsibility for safeguarding concerns;
 - who is responsible for reporting and investigating safeguarding concerns; and
 - the procedure to be followed for dealing with safeguarding concerns.
- Responding to reports about partners: If III Europe receives a safeguarding report about a partner organisation, we will contact the partner and expect them to respond quickly and appropriately. III Europe will assist the partner and will require them to report on the outcome (as permitted under data protection laws).

- Drawing consequences: If we have reason to believe that an allegation has not been dealt with appropriately by a partner organisation and/or if an investigation uncovers serious issues relating to the governance or management of a partner organisation, III Europe will give serious consideration to ending the partnership.

10. Transparency and Accountability

We are committed to transparency and accountability in our safeguarding prevention and response efforts. This commitment is reflected in:

- Reporting: We report to our stakeholders, staff, donors, and beneficiaries on our progress in implementing this policy and addressing safeguarding cases.
- Learning and Improvement: We commit to continuous learning and improvement through regular policy reviews, external audits, and incorporating feedback from our staff, partners, and beneficiaries.
- Whistleblower Protection: We safeguard whistleblowers and encourage the reporting of any misconduct without fear of retribution. For more information, refer to our Whistleblower policy.

9. Monitoring and Review

This policy will be reviewed regularly, and updates will be made as necessary to reflect changes in legislation, emerging best practices, and the evolving needs of our staff and partners.

10. Conclusion

III Europe is unwavering in its commitment to protecting 'adults at risk', children and young people, including any other vulnerable groups. By upholding this policy, we ensure the protection and dignity of all individuals we work with, fostering a culture of respect, accountability, and transparency across our operations. Any questions and comments regarding III Europe' Safeguarding Policy should be addressed to the Safeguarding Focal Point (SFP), Mette Honoré, reachable at Report.misconduct.IIIEUR@safestandards.dk.